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IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA
IN AND FOR DADE COUNTY, FLORIDA
CIVIL DIVISION

JEAN-LUC BRUNEL, individually,
and MC2 MODEL &
TALENT MIAMI, LLC

Civil Action No.: 14-21348 CA 01

Plaintiffs,

vs.

JEFFREY EPSTEIN,
TYLER MCDONALD, TYLER
MCDONALD D/B/A/ YI.ORG

Defendants.

AMENDED VERIFIED COMPLAINT FOR LEGAL & EOUITABLE RELIEF AND DAMAGES

COME NOW the Plaintiffs, Jean-Luc Brunei and MC2 Model & Talent Miami, LLC, by and through undersigned counsel, and sues Defendants Jeffrey Epstein, Tyler McDonald, and Tyler McDonald d/b/a/ Yi.Org for legal relief, equitable relief and defamation, and states as follows:

1. Venue is proper in Dade County, Florida as Defendants Tyler McDonald and Tyler McDonald d/b/a Yi.Org do business in Dade County, Plaintiff Jean-Luc Brunel resides in Dade County, Florida, and PlaintiffMC2 Model & Talent Miami, LLC, has an office in Dade County. The causes of action and damages against Defendant Jeffrey Epstein accrued in Dade County, Florida, due to specific acts by Epstein there, and accordingly, venue is appropriate there. Florida Statute 47.011.

2. Florida Statute 48.193(l)(a)(1) ("long-arm") authorizes service on both out-of-state Defendants (Tyler McDonald, and Tyler McDonald d/b/a/ Yi.Org).

3. Jurisdiction is proper in the Circuit Court as this action seeks relief in excess of fifteenthousand dollars (S 15,000).

FACTUAL ALLEGATIONS AS TO DEFENDANT JEFFREY EPSTEIN

4. Plaintiff Jean-Luc Brunel is the owner of Plaintiff modeling agency known as "MC2 Model & Talent Miami" ("MC2"). MC2 began operations in October 2005 and has offices in New York, Miami, and Tel Aviv.

5. Defendant Jeffrey Epstein ("Epstein") is a hedge-fund manager with a residence in Palm Beach County, Florida. Defendant has been the subject of significant media coverage due to charges brought against him involving sexual contact with minors. (Composite Exhibit A attached).

6. Plaintiff Brunel and Epstein have known one another since the inception of Plaintiff MC2.

7. Plaintiff Brunel operated his modeling agency, Plaintiff MC2, without incident until Epstein was first charged in Palm Beach County with unlawful sexual contact with a minor in 2006. He was convicted of soliciting prostitution from a minor and sentenced to eighteen months in prison, of which he served thirteen months. He remains a registered sex offender in Florida as of this day.

8. First, after the initial criminal charges against Epstein were filed in Palm Beach County, Plaintiffs were widely implicated in the media as being "linked" to Epstein. These false stories caused both Plaintiffs a tremendous loss of business.

9. Plaintiffs lost multiple contacts and business in the modeling business as a direct result of Epstein's illegal actions. For example, several photographers will not work with MC2 due to the adverse publicity surrounding Epstein and his illegal activities, and the publicity falsely linking Plaintiffs with those activities; namely, sex trafficking. (Composite Exhibit A).

10. One example of such a photographer was Michael Avedon, who worked with MC2 on photo shoots. Avedon stopped answering Plaintiffs' emails and phone calls after having known Plaintiff for some time. Upon meeting Avedon out one night, Avedon stated to Plaintiff Brunel he had "found out some information" from some friends of his and that he could not associate his name with MC2.

11. This statement by Avedon was no doubt a reference to the alleged and false links between Plaintiffs and Epstein's illegal activities with under-aged girls. This incident clearly illustrates an example of lost business on Plaintiffs' behalf.

12. The second example of a business relationship that was terminated due to Epstein's intentional and illegal activities was a very recent one, involving an overseas agency, Modilinos Model Agency. The owner stated that the model to be placed with MC2 "found some article in internet, which changed her position and she preferred to be placed with another agency." This was relayed to Plaintiff Brunel by e-mail dated October 15, 2014. This amply demonstrates that Epstein's intentional & illegal activities continue to cost Plaintiffs' business income. (Exhibit B attached).

13. A third example of a lost business relationship can be found in an e-mail dated October 1 7, 2014 (Exhibit C attached). The director of the I Mother Agency, Vladmir Yudashkin, states that a specific model will not sign with Plaintiff MC2 due to her fear that Plaintiffs' will force her into illegal activities. The model bases her fears upon the stories on the internet falsely implicating Plaintiffs as being involved with illegal activities with young models. This is another example of a false link between Epstein and Plaintiffs, costing Plaintiffs' business income.

14. A foulth example of a lost business relationship can be found in a second e-mail dated

October 1 7, 2014 (Exhibit D attached). Manuela Martinez of Mega Partners, a Brazilian modeling agency, states to Plaintiff Brunel that her agency has been unable to work with Plaintiff MC2 for the past five to six years because of the sex trafficking allegations against Plaintiffs . This reference is clearly to the false allegations online regarding sex trafficking that were based in the false link between Epstein and Plaintiffs.

15. A fifth example of a lost business relationship can be found in an e-mail dated on Plaintiffs behalf was an e-mail dated August 27, 2010 from Michelle Stockman of Agence France Presse. (Exhibit E attached). Agence France Presse is a newswire service with a worldwide reach. Stockman wanted to meet with Plaintiff Brunel to arrange a model shoot with MC2. However, due to the adverse publicity surrounding Plaintiffs as a result of Epstein's illegal activities, Plaintiff Brunel was forced to forego (and lose) this business opportunity because he needed to keep a low-profile at this time.

16. A sixth example of lost business due to Epstein's intentional and illegal activities can be found in an e-mail dated December 12, 2014. (Exhibit F attached). Michael Sanka, a talent scout who had worked with Plaintiffs for a number of years, informed Plaintiff Brunel that he cannot sign any new models for Plaintiff Brunel's MC2 agency due to the false sex trafficking allegations online. Sanka goes on to state that Plaintiff Brunel's MC2 agency will not attract any new models if Plaintiff Brunel does not clear up the false allegations.

17. A seventh example of lost business due to Epstein's intentional and illegal activities can be found in an e-mail from Fox Fashion Agency (Exhibit G attached). This e-mail clearly states that Fox has placed models with Plaintiff MC2 in the past with absolutely no problems. However, because of the false internet trafficking links between Plaintiffs and Epstein, Fox states that it cannot place anymore models with PlaintiffMC2 until the allegations are cleared up.

18. Before the false links between Plaintiff and Epstein surfaced, Plaintiff Brunel was earning a great deal of revenue from MC2 Miami.

19. The false links between Plaintiffs and Epstein began to surface online in about 20052006. Then, in 2006, Plaintiffs received a letter of credit from Epstein at 5% interest. Plaintiffs then made an investment totaling one-million dollars with Elite Paris, to start a company.

20. Next, Plaintiff Brunel started the company, "E Management", to work with Elite Models in Paris, Plaintiff had to close it almost immediately, because Elite didn't send any models to PlaintiffMC2 for fear of being linked to Epstein.

21. Because the false links between Plaintiffs and Epstein began to gain strength online, Elite Paris severed the agreement due entirely to these false links. Plaintiff Brunel lost his investment of one-million dollars because of this loss of business.

22. Plaintiffs lost potentially ten-million dollars in profits due to this initial one-million dollar loss.

23. Additionally, a former financial controller of MC2, Maritza Vasquez, stated in a 2012 deposition that Plaintiff Brunel had never done anything inappropriate or illegal with any underage model. (Exhibits HI & H2 -Transcript of Deposition of Maritza Vasquez).

24. Maritza Vasquez was fired from her job at Plaintiff MC2 for embezzling company funds, and had criminal charges filed against her (Composite Exhibit I attached). She was also the source of the false information linking Plaintiffs to sex trafficking in the articles written by

Conchita Sarnoff ofthe website Jezebel (Composite Exhibit A, p.2-7).

25. The deposition testimony of Maritza Vasquez referred to above clearly demonstrates that Plaintiff Brunel has clean hands and was never involved in sex trafficking. All of Plaintiffs' damages came solely from Epstein's conduct.

26. Additionally, Plaintiff Brunel has had significant delays in obtaining his visa to come to the U.S. These delays were also the result of the false link between Plaintiffs and Epstein.

As a result of these delays, Plaintiffs lost a considerable amount of time & money. International travel is a significant component of Plaintiff Brunel's MC2 modeling business. Plaintiff Brunel has been forced to cancel his latest visa application as a result of the delays. (Exhibit J _Composite — Visa Docs).

27. As a result of the notoriety and tremendous publicity surrounding Epstein's criminal charges, and the media linkage of Epstein to Plaintiffs regarding illegal activities, Plaintiffs lost a tremendous amount of business and revenue.

28. Plaintiff Brunel's agency MC2 has lost millions of dollars in revenue since the media revealed that Plaintiffs and Epstein were associated. In fact, Plaintiff MC2 was worth millions of dollars; now, due to the illegal actions of Epstein, MC2 is almost worthless.

29. At no time did Epstein ever publicly state that Plaintiffs had no role whatsoever in the Epstein's illegal activities.

30. As a result of Epstein's illegal activities and his association with Plaintiffs, Plaintiffs continue to lose money and suffer damages to this day. (Exhibit K attached, Jeff Fuller email, 11-12-14).

31. Plaintiff Brunel will need to spend millions of dollars in order to restore his business to what it was once worth — money that the Plaintiff Brunel does not have.

32. Plaintiff Brunel continues to own and operate Plaintiff MC2 to this day, their names never having been cleared from the massive and totally negative media coverage involving Epstein and his illegal activities. Plaintiffs have been, and continue to be, irreparably harmed by these false internet-based links to Epstein. (Exhibits R & S attached).

33. Second, Plaintiff Brunel was also told by Epstein to leave the Palm Beach area in anticipation of a deposition of PlaintiffBrunel in a criminal case against Epstein. On the direct advice of Epstein, Plaintiff Brunel went to Europe and Asia for a period of time. This was done for the sole purpose of delaying Plaintiff Brunel's deposition.

34. As a direct result of Plaintiff Brunel's travels, his deposition was delayed twice. When it was finally scheduled for November 2009, Plaintiff Brunel was in fact available (Exhibit L attached). However, a medical emergency in the family of his attorney further delayed this deposition (Exhibit M attached). It was never rescheduled and he was never deposed.

35. This was a blatant example of obstruction ofjustice in the criminal case. Epstein was solely responsible for telling Plaintiff Brunel to leave the area. Plaintiff Brunel lost a huge opportunity to clear his name, and that of his agency, Plaintiff MC2.

36. Third, as a result of all of the facts stated above, Plaintiff Brunel was under tremendous psychological pressure throughout this period of time.

37. This psychological pressure resulted in Plaintiff Brunel avoiding business contacts as set forth above. This pressure also directly caused Plaintiff Brunel to avoid certain social contacts during this period of time.

38. Plaintiff Brunel became extremely withdrawn and anxious at this time.

39. Epstein's conduct was the direct cause of Plaintiff Brunel's psychological state. The press was reporting extensively on the lurid details of Epstein's illegal activities with the underaged girls.

40. As stated above, the press reports were erroneously connecting both Plaintiffs to Epstein's illegal activities. (Composite Exhibit A attached).

41. Epstein's illegal activities were outrageous and extreme; they involved receiving massages from the under-aged girls while the girls were nude or nearly-nude; penetration of the girls with a finger or object; or full-intercourse.

42.These activities described above caused Plaintiff Brunel severe emotional distress. In fact, Plaintiff Brunel has recently undergone psychotherapy with a local psychologist, Dr. Royce

N. Jalazo, as a result of Epstein's actions and the negative results on his business. (Exhibits N & O attached).

43. Plaintiff Brunel is emotionally destroyed as a result of Epstein's actions and the resultant effects on his business. He has been on medications to deal with the effects of this. (Composite Exhibit P — Medical History).

44. Plaintiffs have been damaged by the conduct of Defendant Epstein, and have accordingly retained undersigned counsel to represent him in this matter, and are obligated to pay counsel a reasonable fee for his services.

FACTUAL ALLEGATIONS AS TO DEFENDANTS TYLER MCDONALD & TYLER MCDONALD D/B/A YI.ORG

45. Defendant Tyler McDonald ("McDonald") is the owner/operator ofYi.Org and also does business as Yi.Org Defendant Tyler McDonald d/b/a Yi.org ("McDonald d/b/a Yi.Org"). Defendant McDonald resides in the state of Washington. Yi.Org is a website hosting service based in Vancouver, British Columbia, Canada.

46.In about 2009, Yi.org, by and through the actions of its owner, McDonald, began hosting websites that contained hyperlinks that contained blatantly false and extremely disparaging information about Plaintiffs. (Exhibit Q attached - hyperlink screenshot).

47. These links clearly and falsely associated Plaintiffs with illicit escort services in the state of Florida; information which Defendants McDonald and McDonald d/b/a Yi.Org knew, or should have known, was false.

48. These links have damaged Plaintiff Brunel's reputation as an owner of a well-established modeling agency with offices in New York and Miami, PlaintiffMC2.

49. These links have also damaged the reputation of both Plaintiffs.

50. The combined damage to the reputation to both Plaintiffs has resulted in a significant loss of revenue to PlaintiffMC2, and accordingly, to Plaintiff Brunel.

51. PlaintiffMC2 's revenues have fallen to a mere fraction of what they were before the appearance ofthe links on Yi.Org.

52. Both Defendants McDonald d/b/a Yi.Org and McDonald assisted in the dissemination of the false and negative information that damaged Plaintiffs' reputation and directly caused damages to Plaintiffs.

53. Plaintiff Brunel continues to own and operate Plaintiff MC2 to this day, both names still harmed by the false and negative association with escort services in Florida.

54. Accordingly, Plaintiffs have been severely damaged by information on websites hosted by Yi.Org, which is maintained, owned and operated by Defendants McDonald d/b/a Yi.Org and McDonald.

55. The information disseminated by the websites hosted by Defendants McDonald d/b/a Yi.Org and McDonald was false and defamatory to the extreme regarding Plaintiffs alleged involvement with escort services in the state of Florida.

56. Defendants McDonald d/b/a Yi.Org and McDonald have made no attempt to clear the names of Plaintiffs with regard to the false and defamatory information disseminated by the websites they hosted.

57. Plaintiffs continue to do business to this day, their names never having been cleared from the negative information disseminated by Defendants McDonald d/b/a Yi.Org and McDonald.

58. Plaintiffs have been damaged by the conduct of Defendants McDonald d/b/a Yi.Org and McDonald, and have accordingly retained undersigned counsel to represent him in this matter, and are obligated to pay counsel a reasonable fee for his services.

COUNT 1 - EOUITABLE RELIEF FOR LOSS OF BUSINESS AND REVENUE - AS TO DEFENDANT JEFFREY EPSTEIN

59. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

60. Plaintiffs have lost a significant amount of business revenue because of the actions of Defendant Epstein set forth above.

61. Plaintiffs have no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business revenue due to the actions of Defendant Epstein.

62. Accordingly, Plaintiffs seeks to become whole by the payment of damages by Defendant Epstein to compensate him for his losses.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANT as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate.

COUNT 11 - OBSTRUCTION OF JUSTICE - EOUITY - AS TO DEFENDANT JEFFREY EPSTEIN

63. The allegations contained in paragraphs I through 44 above are re-alleged and incorporated herein by reference.

64. Plaintiff was forced to commit illegal acts by traveling away from the sight of the deposition and during the time period of the deposition.

65. Defendant Epstein attempted to subvert justice and this attempt contributed to the destruction of Plaintiffs business, PlaintiffMC2. Plaintiff Brunel lost substantial time away from his business and incurred expenses in following Epstein's commands.

66. Plaintiffs were substantially damaged as a direct result of Epstein's actions.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANT as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate.

COUNT 111 - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UPON PLAINTIFF BRUNEL - AS TO DEFENDANT JEFFREY EPSTEIN

67. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

68. Defendant Epstein recklessly inflicted emotional distress upon Plaintiff Brunel by engaging in illegal conduct with under-aged girls, which was falsely linked to Plaintiffs.

69. This illegal conduct was extreme and outrageous by any standard.

70. This extreme and outrageous conduct was the direct cause of extreme emotional distress in Plaintiff Brunel.

WHEREFORE, PLAINTIFF BRUNEL requests judgment against DEFENDANT as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate

COUNT IV - EOUITABLE RELIEF FOR LOSS OF BUSINESS AND REVENUE - AS TO DEFENDANTS TYLER MCDONALD AND MCDONALD D/B/A YI.ORG

71. The allegations contained in paragraphs I through 3 & 45 through 58 above are realleged and incorporated herein by reference.

72. Plaintiff, through his agency MC2, has lost a significant amount of business revenue because of the actions of Defendants McDonald d/b/a Yi.Org and McDonald set forth above.

73. Plaintiffs have no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business revenue due to the actions of both Defendants.

74. Accordingly, Plaintiffs seek to become whole by the payment of damages by both Defendants to compensate him for his losses.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate.

COUNT V - DEFAMATION AGAINST PLAINTIFFS - AS TO DEFENDANTS TYLER MCDONALD AND MCDONALD D/B/A YI.ORG

75. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are realleged and incorporated herein by reference.

76. Defendants McDonald d/b/a Yi.Org and McDonald published or caused to be published, false statements about Plaintiffs using their domain hosting service.

77. Defendants McDonald d/b/a Yi.Org and McDonald knew, or should have known, that the statements about Plaintiffs were false.

78. These published statements were read by the internet users who viewed the false statements.

79. Plaintiffs' business reputations were severely damaged as a result.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate.

COUNT VI - EOUITABLE RELIEF FOR REPAIR OF BUSINESS REPUTATION - AS TO DEFENDANTS TYLER MCDONALD & TYLER MCDONALD D/B/A/ YI.ORG

80. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are realleged and incorporated herein by reference.

81. Plaintiffs have also suffered a significant loss of their business reputations as a direct result of the actions of Defendants McDonald d/b/a Yi.Org and McDonald.

82. Plaintiffs have no adequate legal remedy to make them whole as a result of the damages suffered in the form of lost business reputations due to the actions of both Defendants.

83. Accordingly, Plaintiffs seeks to restore their business reputations by the payment of damages by both Defendants to compensate them for their loss of reputations.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate.

Is/ Joe Titone

Joe Titone
Attorney
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VERIFICATION

STATE OF FLORIDA

COUNTY 0F/A4g-z-Cur)

JEAN-LUC BRUNEL, being duly sworn according to law, upon his oath, deposes and says:

I have read the foregoing complaint and all the allegations contained therein. All such allegations contained allegations are true based upon my personal knowledge, informatio and belief.

nformation and belief.

JEAN-LUC BRUNEL

ne this 1 day of August, 2014.

Sworn and subscribed to before me this

PABLO VALLADARES
Notary Public - State of Florida
My Comm. Expires Oct 31, 2016
Commission # EE 216890
Bonded Through National Notary Assn.

NOTARY PUBLIC
NOTARY UBLIC

COMPOЬITE

EXHB!T A

http://www.thedailybeast.com/articles/2010/07/29/jeffrey-epstein-feds-probe-possible-childtrafficking-charge.html

Epstein Faces Sex-Traffic Probe

The Justice Department is investigating Jeffrey Epstein for child trafficking, The Daily Beast has learned—and has widened the scope of its probe to include a famous modeling agency.

Hedge-fund manager Jeffrey Epstein completed his sentence for soliciting prostitution with a minor last week. But it appears his problems may not be over. Now The Daily Beast has learned that:

- Federal investigators continue to investigate Epstein's activities, to see whether there is evidence of child trafficking—a far more serious charge than the two in his nonprosecution agreement, the arrangement between Epstein and the Department of Justice allowing him to plead guilty to lower-level state crimes. Trafficking can carry a 20-year sentence.

- The FBI is also investigating Epstein's friend Jean Luc Brunel, whose MC2 modeling agency appears to have been a source of girls from overseas who ended up on Epstein's private jets.

Because Epstein's predatory habits stretch back many years and involved dozens of younglooking girls, there may well be more evidence to uncover.

Under the concept of double jeopardy, Epstein can no longer be prosecuted for any of the charges covered by his non-prosecution agreement, in which he agreed to serve a short term of incarceration, fund the civil suits of named victims, and register as a sex offender. The victims who accepted cash settlements in these civil suits agreed not to testify against him or speak publicly about the case. However, new evidence developed by the Department of Justice on other offenses not covered by the agreement, including allegations by additional victims who come forward, could lead to new charges. There is no statute of limitations in the federal sextrafficking law, which was also enacted by the state of Florida in 2002. Because his predatory habits stretch back many years and involved dozens of young-looking girls, there may well be more evidence to uncover. (Several young women who claim to be Epstein victims have recently contacted a Ft. Lauderdale lawyer, but to date no new civil complaints have been filed.)

- Conchita Sarnoff: The Billionaire Pedphile's Sex Den
- Billionaire Pedophile Goes

These new developments come one week after the publication of two articles in The Daily Beast about Epstein's pattern of sexual contact with underage girls, which Palm Beach police began investigating in 2005 and the U.S. Attorney's office then settled in a 2007 plea deal. The first article quoted a deposition by then-Palm Beach Chief of Police Michael Reiter, in which he stated

that Epstein, a billionaire with many powerful friends, had received special treatment in both his plea deal and the terms of his incarceration. Although federal investigators at one point produced a draft 53-page indictment against Epstein, he was eventually allowed to plead guilty to only two relatively minor state charges and receive a short term of incarceration: 13 months in the county jail, during which he went to the office every day, and one year of community control, during which he traveled frequently to New York and his private island in the Virgin Islands.

The Daily Beast has now discovered another instance in which Epstein apparently received special consideration: As a convicted sex offender, he is required by law to undergo an impartial psychological evaluation prior to sentencing and to receive psychiatric treatment during and after incarceration. This is because child molesters tend to be repeat offenders with high rates of recidivism. According to a source in law enforcement, however, Epstein was allowed to submit a report by his private psychologist, Dr. Stephen Alexander of Palm Beach, Florida, whose phone has since been disconnected with no forwarding information.

The Daily Beast's second article provided details about Epstein's systematic abuse of underage girls at his Palm Beach mansion, where members of his staff allegedly recruited and paid a parade of teenagers, most of them 1 6 or younger, to perform daily massages that devolved into masturbation, groping, and sometimes full-blown sexual contact. It also revealed a monetary relationship between Epstein and Jean Luc Brunel, a frequent visitor to whom he gave $1 million around the same time that Brunel was starting his MC2 modeling agency. Some ofthe young girls MC2 recruited from overseas—often from Eastern Europe and South America—are known to have been passengers on Epstein 's private jets.

The U.S. Attorney General's Office in Florida says that it is against policy to confirm or deny the existence of an investigation. Jeffrey Epstein's lawyer, Jack Goldberger, says he has no knowledge of an ongoing probe, and he told The Daily Beast, "Jeffrey Epstein has fully complied with all state and federal requirements that arise from the prior proceedings in Palm Beach. There are no pending civil lawsuits. There are not and should not be any pending criminal investigations, given Mr. Epstein's complete fulfillment of all the terms of his non-prosecution agreement with the federal government. "

Conchita Sarnoffhas developed multimedia communication programs for Fortune 500 companies and has produced three current-events debate TVprograms, The Americas Forum, From Beirut to Kabul, and a segmentfor The Oppenheimer Report . She is writing a book about child trafficking in America http://www.thedaiIvbeast.com/articles/2010/07/22/ieiTrev-epstein-pedophile-bilIionaire-andhis-sex-den.html

The Billionaire Pedophile's sex Den

Hedge fund mogul and sex offender Jeffrey Epstein, who went free this week, lived in a depraved world of thrice-daily massages, pornographic artwork, and hush money—that's only now being revealed. Conchita Sarnoff reports on the sordid details in part two of her exclusive exposé.

Hedge fund mogul and sex offender Jeffrey Epstein, who went free this week, lived in a depraved world of thrice-daily massages, pornographic artwork, and hush money—that's only now being revealed. Conchita Sarnoff reports on the sordid details in part two of her exclusive exposé. Also:

- Nude images of young girls were scattered around the house and the bathroom soap was shaped like sex organs

- Staff trolled for fresh recruits to make sure Epstein had two or three massage appointments each day

- The house manager has been sentenced to a longer prison term than Epstein—for trying to sell notes regarding massage appointments

- Epstein gave $1 million to his friend Jean Luc Brunel when he was starting the modeling agency MC2

- According to a former bookkeeper, young girls were brought to the U.S. by MC2—often from Eastern Europe—then traveled on Epstein's private jets

JefTre E stein's loyal friends say that his prosecution was unduly harsh, rather than outrageously lenient. They insist that his sexual habits, although obsessive and unusual, were mostly legal and essentially harmless. As the police records attest, the girls brought to El Brillo Way were routinely told they could "say no" at any time during a massage as Epstein escalated contact in a step-by-step assault that was remarkably similar in every victim's statement: First she would be asked to remove her shirt, then her pants. He would attempt to fondle her buttocks and breasts as he masturbated, then bring out a large vibrator. There was sometimes digital penetration, and the more willing girls were lured into full-blown sexual relations with both Epstein and Nadia Marcinkova, who was referred to in press accounts and police reports as Epstein's live-in "sex slave."

A former bookkeeper in the Miami office, who also arranged visas for girls traveling to the U.S., confirmed that MC2 girls became frequent guests on Epstein's private jets.

It's true that some underage girls may have lied about their age, and some came to the house voluntarily several times—although, according to Florida statutes, none of that has any bearing on the criminality of the contact, particularly if the girl was 16 or younger. But what is particularly disturbing about this case—judging by arrangements at the Palm Beach house—is that Epstein, a billionaire hedge-fund manager, organized his life around this sexual compulsion in an open and methodical way that suggests he felt he was beyond the law.

- Conchita Sarnoff: Epstein Faces Sex Traffic Probe
- Billionaire Pedo hile Goes Free

According to police who executed a search warrant, the house was decorated with large, framed photos of nude young girls, and similar images were found stashed in an armoire and on the computers seized at the house (although police found only bare cables where other computers had been). Some bathrooms were stocked with soap in the shape of sex organs, and various sex toys, such as a "twin torpedo" vibrator and creams and lubricants available at erotic specialty shops, were stowed near the massage tables set up in several rooms upstairs.

Epstein also enlisted his staffin the predatory activity, and four—Sarah Kellen, Adriana Ross,

Lesley Groff, and Marcinkova—figured in the FBI investigation. The Non Prosecution Agreement stipulated that they would not be charged. According to police reports and sworn statements in the civil suits, all four women, among their other duties, worked to ensure that an appointment book for twice- or thrice-daily "massages" was stocked with fresh recruits. Ghislaine Maxwell, daughter ofthe late Czechoslovakian-born press baron Robert Maxwell, who was for many years Epstein's live-in partner, also recruited young girls.

Since his 13-month sentence for soliciting prostitution with a minor, Epstein has settled more than a dozen lawsuits brought by underage girls. Seven victims reached a last-minute deal last week, days before a scheduled trial; each received well over $1 million—an amount that will hardly dent Epstein's $2 billion net worth.

The victims told police they waited in the kitchen to be called upstairs for a massage, and the house chef often gave them a bite to eat. House manager Alfredo Rodriguez said in his sworn statement that a maid named Lupita, who was a devout Catholic, wept when she complained to him about cleaning up after the massage sessions, picking up soiled towels and putting away the sex toys. And she was upset that a photo of Epstein with the pope hung next to one ofhim with a young girl.

Ironically, Rodriguez, who ran the house on El Brillo Way in 2004 and 2005, ended up being sentenced to more jail time than his boss as a result of the complex investigation into Epstein's activities. He was fired, he says, for inadvertently drawing police attention to one ofthe girls when she arrived at the house unannounced to collect money. He saw an unfamiliar "beater" in the driveway one evening and called 911. When he left Epstein's employ, Rodriguez took away some notes and emails about massage appointments as "protection" against his own prosecution, and failed to produce them during the Palm Beach Police Department's initial investigation.

Unable to get work as a house manager elsewhere in South Florida, he says, Rodriguez later tried to sell this "golden nugget"—his term—for $50,000, to be used in the victims' civil suits.

Unfortunately, he made the offer to an undercover cop, and was subsequently charged with "obstruction of official proceedings" for withholding information that could have advanced the criminal investigation of Epstein—which by that point had been settled in a plea deal. Rodriguez was sentenced to 18 months in federal prison (Epstein was allowed to serve 13 months in the Palm Beach county jail), and now awaits an additional sentence on Aug. 24 in federal coun in Miami for transporting firearms, another deal he says he made to pay the bills after he lost his job.

In a deposition given for the civil suits, Rodriguez testified that he was instructed to always have $2,000 in cash on hand, so that he could pay both the girls who gave massages and recruiters such as Haley Robson who brought them to the house. He also testified that Epstein made large contributions to the Palm Beach Police Department, and in return was given PBPD baseball hats to put on the dashboard of his various cars to avoid being stopped or ticketed by local police. Retired Police Chief Michael Reiter, in his own deposition, acknowledged that, in addition to earlier donations to the police department (which are fairly common in well-heeled Palm Beach), Epstein had recently given the department $100,000 for some sophisticated equipment. The police were still researching the purchase when Epstein came under suspicion, and Reiter ordered the money returned. (Guy Frostin, one of Epstein's local attorneys, told police that Epstein also gave $100,000 to the Florida Ballet for massages, because he was "very passionate" about massages being "therapeutically and spiritually" beneficial. Yet victims told police they had no massage training.)

Perhaps most disturbing, in terms ofpossible sex trafficking, was Epstein's relationship with Jean Luc Brunel, owner of the MC2 modeling agency. According to a complaint filed in the U.S. District Court for the Southern District of Florida, an alleged victim said that Epstein, Maxwell, Brunel, Rodriguez, and Marcinkova "deliberately engaged in a pattern of racketeering that involved luring minor children through MC2, mostly girls under the age of 17, to engage in sexual play for money." (Which would amount to trafficking.)

Brunel is a 50-plus French playboy who was formerly part owner ofKarin, a Paris-based modeling agency. He lives in New York and South Beach, Florida, and owns 85 percent of MC2, which has offices in New York, Miami, and Tel Aviv. (The remaining 15 percent is owned by his partner, Jeff Fuller.) Brunel has been observed as a house guest at Epstein's Palm Beach home and may well have had contact with him also in New York, where Epstein owns a lavish home, and in Paris, where Epstein keeps an apartment on elegant Ave. Foch.

CBS reporter Craig Pyes, who investigated Brunel for a 60 Minutes broadcast many years ago, is quoted in Michael Gross' book about the modeling industry, Model: The U (v Business o Beauti/id Women. Pyes told the author that Brunel "ranks among the sleaziest people in the fashion industry. We're talking about a conveyor belt, not a casting couch. Hundreds of girls were not only harassed but molested." Now The Daily Beast has learned that Epstein had made a $1 million wire transfer to Brunel's offshore bank account in September 2004, just as he was setting up MC2. Whether this was a gift or a loan or a backdoor investment in the new venture is unknown. A French citizen who managed to avoid giving evidence in the Epstein investigation, Brunel declined to comment on any of this, as does Fuller. Asked in April of Brunel's activities, Epstein said "I'm 100 percent convinced that he doesn't traffic children." (Brunel has never been charged.)

An American fashion designer who booked her girls through MC2 says they were very young and very beautiful; many were from Eastern Europe and spoke little English. A former bookkeeper in the agency's Miami office, who also arranged visas for girls traveling to the U.S., confirmed that MC2 girls became frequent guests on Epstein's private jets.

Pilot logs obtained in the civil suits show that some of the named plaintiffs were on the flight manifests. Other times, the pilot would just list the other passengers plus "female."

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Editor's Note: An earlier version of this article misidentified the subject of Craig Pyes investigation and the title ofMichael Gross ' book. The Daily Beast has corrected the subject and title and regrets the error.

Read Conchita SarnofTs orioinal re ort on E stein.

Conchita Sarnoffhas developed multimedia communication programs for Fortune 500 companies and has produced three current events debate television programs, The Americas Forum, From Beirut to Kabul, and a segmentfor The Oppenheimer Report. She is a contributor to The Huffington Post. She is writing a book about child trafficking in America.

http://fashioncopious.typepad.com/fashioncopious/2010/08/mc2-modeling-agency-involved-in-sextrafficking.html

MC2 Modeling Agency Involved In Sex Trafficking

August 11,2010

On August 4th Jezebel ran the following story: The Sex-Traffickin Model Scout.

Perhaps most disturbing, in terms of possible sex trafficking, was Epstein's relationship with Jean Luc Brunel, owner ofthe MC2 modeling agency. According to a complaint filed in the U.S. District Court for the Southern District of Florida, an alleged victim said that Epstein, [assistant and girlfriend Ghislaine] Maxwell, Brunel, [house manager Alfredo] Rodriguez, and Marcinkova 'deliberately engaged in a pattern of racketeering that involved luring minor children through MC2, mostly girls under the age of 17, to engage in sexual play for money.

The previous paragraph in the story read:

and making [speaking of Jeffrey Epstein] frequent $100,000 donations to the Palm Beach Police Department would insulate him from prosecution for his various depravities.

Which included, for the record: buying a 14-year-old Yugloslavian named Natalia Marcinkova from her parents in order to keep Marcinkova as his "sex slave"; paying a retinue of women to trawl Palm Beach for teenagers economically desperate enough to agree to give Epstein "massages" that often led to sexual contact; receiving two 12-year-old French girls as a "birthday present"; and befriending Michael Wolff. http://bettyfokker.wordpress.com/2010/08/20/hes-helping-others-get-away-with-child-sextrafficking/

He's helping others get away with child-sex trafficking

Posted on August 20 201() by Betty Fokker

Let's discuss that billionaire douche-face child-rapist, Jeffre E stein for a moment shall we? He's someone who likes to have sex with venerable underage girls, including 12 year old girls who are trafficked into the US under the guise that they will become models. His partner in crime was Jean Luc Brunel, owner and 'talent scout' of the MC2 "modeling agency". Epstein coincidently invested a million bucks in the MC2 ~~iddie porn ring~~modeling agency and let Brunel use his privet jet.

The FBI thinks Epstein has assaulted/molested about 40 or so young girls. So he's going to prison for the rest ofhis life right? Wrong.

When faced with the best defense lawyers money could buy, the prosecutors wimped out and made a plea bargain so light it boggles the mind. This kid-raping bastard only had to please

guilty to two MINOR charges and gets a private cell, a cell he gets to leave on a "work release program" by the way.

Now, I am not blaming his defense attorneys. They were doing their job and, under our constitution, a festering anus like Epstein has the right to the best attorneys he can afford.

I am livid with the prosecuting attorneys. It was their job to do everything in their power to bring this vomit-inducing shit-sack to justice. Instead, they decided to gutlessly pander to his wealth, privilege, and powerful defense team. They rolled over and did everything but send in another kid to give this fucker a hand-job. So this vermin got away with raping 12 year old girls because the prosecuting attorneys couldn't find a single testicle/ovary to share among them.

And do you know what their chicken-shit kowtowing to Epstein has wrought? It's opened the door for other child-sex traffickers to get lighter sentences for their crimes too. Why should they have to pay when he didn't? After all, it was just girls they were trafficking for sex with disgusting older males (I refuse to call something like Epstein a "man"; it insults men) . . they weren't harming anything of any value in our culture!

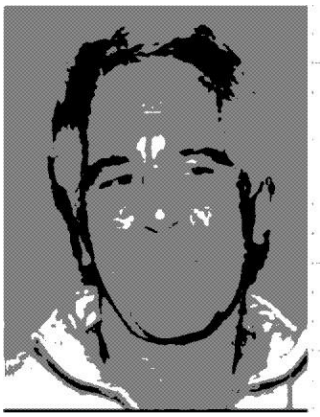
I'm a feminist because I think girls & women have value. What a crying, fucking shame there wasn't one feminist in the prosecutors office to go after this monster and punish him. What a pity other hell-spawn might get away with trafficking girls for sex more easily because ofthe shitfor-brains attorneys who let Epstein get away with his crimes.

My eyeballs are melting with rage.

Never mind. They aren't melting. It's just tears of helpless and despairing rage against an unjust legal system and the cultural devaluation of women and girls.

http ://gawker.com/5600294/recently-freed-sex-offender-jeffrey-epstein-may-face-child-trafficking-charges

Recentlv-Freed Sex OfTender Jeffrev Epstein _Mav Face Child Trafficking Charges



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Jeffrey Epstein, the billionaire Bill Clinton pal who just left jail after completing a sentence for soliciting sex with a minor, may be headed back soon: The Dailv Beast reports that the Justice Department is investigating him for child trafficking.

Epstein, famous for being rich, being friends with Bill Clinton, having an egg-shaped penis, and being a vindictive pervert, can't be prosecuted again for the charges he copped to in his plea deal. But according to The Daily Beast's Conchila SarnofT, new charges might be coming:

As we learned in Vanity Fair yesterday, Bill Clinton has spent his post-presidential life...Read Inore

Federal investigators continue to investigate Epstein's activities, to see whether there is evidence of child trafficking-a far more serious charge than the two in his non-prosecution agreement, the arrangement between Epstein and the Department of Justice allowing him to plead guilty to lower-level state crimes. Trafficking can carry a 20-year sentence.

Since there's no statute of limitations for sex-trafficking, and Epstein's predatory adventures apparently date back more than a few years, it's likely there's more women who could come forward. (Apparently some have contacted a lawyer, but nothing's been filed yet.)

It's not just Epstein, either—his buddy Jean Luc Brunel, head ofthe MC2 modeling agency, is also being investigated, and some of the models he represented (many from overseas) may have been enlisted as companions on Epstein's private jet. http://www.huffingtonpost.com/2014/06/03/jeffrey-epstein_n 5439407.html

MIAMI (AP) — Nearly a decade ago, a wealthy financial guru came under FBI investigation, suspected of sexually abusing dozens of underage girls at his Palm Beach mansion. Then, abruptly, the investigation was dropped and Jeffrey Epstein pleaded guilty to a single state charge of soliciting prostitution. He served just over a year in jail.

Now, two women who say they were among his victims have won a precedent-setting appeals court ruling entitling them to see all the documents from the plea bargain discussions between Epstein's high-powered lawyers and federal prosecutors.

Their goal: use those files to undo the agreement, reopen the investigation and subject Epstein to more charges.

The women's lawyers contend Epstein got special treatment because of his wealth and connections. His attorneys deny that.

Epstein, 61, made hundreds of millions of dollars managing funds for rich clients. Shortly after his 2008 guilty plea, it came to light that his lawyers had secretly reached a non-prosecution

agreement months earlier with the U.S. Justice Department that spared him a potentially heavier punishment.

"Our complaint alleges that, prodded by Epstein, the federal prosecutors deliberately concealed the sweetheart plea deal they made with him to avoid public criticism," said Paul Cassell, a University of Utah law professor who is representing the two women.

The U.S. attorney's office in Miami would not comment. But the U.S. attorney at the time, R. Alexander Acosta, said in a 201 1 letter defending his office that more evidence came to light after Epstein made his deal.

"Many victims have spoken out, filing detailed statements in civil cases seeking damages. Physical evidence has been discovered," Acosta wrote. "Had these additional statements and evidence been known, the outcome may have been different. "

Epstein has settled lawsuits for undisclosed amounts with many of the women who say they were underage when they were paid for sex.

The case represents the first time a federal appeals court has ruled that the Crime Victims' Rights Act of 2004 guarantees victims the right to be informed about the details of how a plea bargain was reached, according to legal experts and lawyers involved in the case. The law marked the culmination of efforts begun in the 1960s to give crime victims more of a say.

"I hope that the case will ultimately set an important precedent that federal prosecutors can't keep victims in the dark about the plea deals that they reach," Cassell said.

Epstein served 13 months of an 18-month sentence on the prostitution charge, sold his Palm Beach home in 201 1 and now divides his time between a New York City home, a Caribbean island and an apartment in Paris, according to court documents. He also has a large New Mexico ranch.

He donates huge sums each year, particularly toward projects involving new medical treatments and artificial intelligence. His foundation established a Harvard University program that uses mathematics to study evolutionary biology, viruses and disease.

According to lawsuits filed by some of his accusers, Epstein relied on assistants to recruit underage girls to give him massages and perform sex acts. They were usually paid about $200.

Some girls were notified about the investigation beginning in 2006. But they weren't told about the negotiations with federal prosecutors for at least nine months, despite a requirement in the Crime Victims' Rights Act that they be kept informed. The two women — who were 13 and 14 when the alleged assaults occurred sued for the files and won.

"Although plea negotiations are vital to the functioning of the criminal justice system, a prosecutor and target of a criminal prosecution do not enjoy a relationship of confidence and trust when they negotiate," the appeals court said.

Federal prosecutors have begun turning over the documents.

Epstein's attorney, Roy Black, the celebrity lawyer who is also representing Justin Bieber in his DUI and resisting-arrest case in Miami Beach, declined to comment but has asked that the documents be kept from public view, and so far they have been.

In a May 23 court filing, Black said that there was no conspiracy between prosecutors and Epstein's team to violate the victims' rights law and that the non-prosecution agreement contained many provisions Epstein strongly opposed, such as registering as a sex offender and agreeing not to contest certain lawsuits.

"This was no sweetheart deal by any stretch of the imagination, " Black said in court papers.

Even if a judge invalidates the plea deal, it will still be up to federal prosecutors to decide what to do.

"The court can't force the prosecutors to bring charges," said Matt Alexrod, a former federal prosecutor now in private practice in Washington.

http://www.huffingtonpost.com/conchita-s-sarnoff/child-trafficking_b_1269748.html

Conchita Sarnoff

Communications expert

Regulating Modeling Agencies to Help Prevent Child Sex Trafficking

Posted: 02/10/2012 8:49 pm

In 2010, Jezebel, an online site, published "The Sex Trafficking Model Scout" warning about the dangers of deregulated modeling agencies in the U.S.

Given the growing number of modeling agencies that transport underage teenagers from foreign countries into the United States and the growing sex trade of underage girls in the U.S. why does this industry remain deregulated?

Since the advent of this business, modeling agencies have had free reign to scout teenagers from every state in the country as well as every nation in the world. Many of these teenage girls come from economically disadvantaged families and are offered none to very limited protection while traveling and working as "models. "

Jezebel reported that Jean Luc Brunel, one of the cast of characters involved in the ongoing Jeffrey Epstein (a level 3 registered sex offender), eight-year-long case, has been working for

over two decades with a succession of agencies in New York and Paris. According to media reports, Diane Sawyer produced a segment for CBS's 60 Minutes featuring a sex scandal that eventually led Eileen Ford (founder of renowned Ford modeling agency) to stop working with Brunel.

Brunel's latest venture is the modeling agency MC2 based in South Beach, Fla. with satellite offices in New York and Tel Aviv. Since his agency is deregulated and "no criminal charges have been filed by any ofhis accusers" although many have tried to serve him including lawyers representing Epstein's victims, Brunel continues to hide behind his French citizenship to prevent depositions. "Trawling for 5'1 1 " underage teenagers to work for his agency, MC2, or anyone else who requests, Brunel is free to scout for very young girls without limitations." Given his citizenship he also successfully avoided deposition in Epstein's sex related cases.

Like so many other reporters who have tried to report his side of the story when Jezebel contacted Brunel, "he did not respond to our interview request. " According to Jezebel: we spoke to a number of people who worked with his agency and while MC2 isn't considered a major industry player, it isn't exactly bottom-shelf, either... Brunel isn't involved with the business on a day-to-day basis, although he owns an 85 percent stake in MC2. Instead, he does scouting for the agency and takes care of the international relations with other agencies, reports one source. Scouts scour the world for unrepresented teenage girls who could make it as models. They work largely unsupervised and are generally paid a headhunting fee for every girl an agency signs. Even when affiliated with an agency, as Brunel obviously is with MC2, scouts operate mostly independently and with little oversight. The company blog refers to Brunel as a 'scouting tsunami' and MC2 is fairly well known for the strength of its international scouting.

Model, Michael Gross's 1995 book, describes Brunel's activities in Paris from the late 1970s onwards, when he worked for, and eventually owned, the modeling agency Karin. "Jean-Luc is considered a danger," says Jéröme Bonnouvrier. "Owning Karin was a dream for a playboy. His problem is that he knows exactly what girls in trouble are looking for. He's always been on the edge of the system. "

John Casablancas, founder of Elite modeling agency said:

I really despise Jean-Luc as a human being for the way he's cheapened the business. There is no justice. This is a guy who should be behind bars. There was a little group, Jean-Luc, Patrick Gilles, and Varsano. They were very well known in Paris for roaming the clubs. They would invite girls and put drugs in their drinks. Everybody knew they were creeps." Casablancas was a professional rival who was pushed out of his agency for questionable concerns.

Katie Ford human trafficking abolitionist and Eileen Ford's daughter, talked to the Wall Street Journal magazine. In that story "A Model Trade Union," Ford describes herself as a "roving ambassador" to help stop human trafficking. Ford sold her stake in the family business in 2007 to the private equity firm Stone Tower Equity. "In her new life as a nearly full-time, unpaid, roving ambassador for the cause her job is an outgrowth of her former work, rather than a repudiation of it, or an atonement.

Her interest in human trafficking began when a representative ofthe United Nations called to ask if she would participate in a women's leadership group that was studying the issue of trafficking. "I said, 'I can't come talk about it, because I don't know anything about it!'" Ford recalls. "But I went, and after two hours, I knew why I was there. The way people traffic across borders is parallel to the way we recruit models. According to Ford "the target age is 14 to 24, and so it's similar to modeling." I knew how to reach that market" she said, "It was the feeling of: There but for the grace of God... The girls who came to us could have been those girls."

http://jezebel.com/5603638/meet-the-modeling-agent-who-trafficked-underage-girls-for-sex

The Sex-Traffickin Model Scout

Jeffrey Epstein, the billionaire financier who the FBI believes molested around 40 underaged girls, was assisted by a prominent modeling agent and scout. Here's what we know about Jean Luc Brunel.

Jeffrey Epstein, you will no doubt recall, is the man who thou Flit ferrying Bill Clinton on his private jet, lawyering up with superstar Alan Dershowitz, and making frequent $100,000 donations to the Palm Beach Police Department would insulate him from prosecution for his various depravities.

Say you're not as famous or celebrated as Roman Polanski and you want to sexually assault... Read more

Which included, for the record: buying a 14-year-old Yugloslavian named Natalia Marcinkova from her parents in order to keep Marcinkova as his "sex slave"; paying a retinue of women to trawl Palm Beach for teenagers economically desperate enough to agree to give Epstein "massages" that often led to sexual contact; receiving two 12-year-old French girls as a "birthday present"; and befriending Michael Wolff

But as Conchita Sarnoff wrote at The Beast:

Perhaps most disturbing, in terms ofpossible sex trafficking, was Epstein's relationship with Jean Luc Brunel, owner of the MC2 modeling agency. According to a complaint filed in the U.S. District Court for the Southern District ofFlorida, an alleged victim said that Epstein, [assistant and girlfriend Ghislaine] Maxwell, Brunel, [house manager Alfredo] Rodriguez, and Marcinkova 'deliberately engaged in a pattern of racketeering that involved luring minor children through MC2, mostly girls under the age of 1 7, to engage in sexual play for money.'

The FBI investigated Epstein, and identified around 40 underaged victims. Sarnoff reports that the FBI is also investigating MC2 and Brunel for possibly engaging in child sex trafficking. Since pleading guilty to reduced charges of soliciting sex with a minor and serving 13 months of part-time jail, Epstein has become the focus of numerous civil lawsuits from his victims. He has so far settled a dozen.

These same civil complaints allege that young girls from South America, Europe, and the former Soviet republics, few of whom spoke English, were recruited for Esptein's sexual pleasure. According to a former bookkeeper, a number of the girls worked for MC2, the modeling agency owned by Jean Luc Brunel, a longtime acquaintance and frequent guest of Epstein's.

Brunel, along with numerous young models, was a frequent passenger on Epstein's private jet, according to flight manifests. The agency owner also allegedly received Sl million from Epstein in 2005, when he founded MC2 with his partner, Jeffrey Fuller; although Fuller and Brunel denied any such payment from the billionaire pervert in 2007, when rumors started swirling, Sarnoff got confirmation from a former bookkeeper at the agency. Whether the money was a secret investment in MC2, or a payment for Brunel's services as a procurer, is unknown. Brunel also visited E stein in •ail .

So who is Jean Luc Brunel? Although he did not respond to our interview request, we spoke to a number of people who have worked with his agency. While MC2 isn't considered a major industry player, it isn't exactly bottom-shelf, either: MC2 in New York most recently launched the career of Latvian editorial star Ginta Lapina (Brunel "discovered" Lapina via an MC2 scouting competition for young teens) and currently represents Vogue China covergirl Liu Dan. Worldwide, MC2 represents such stars as Sessilee Lopez in Miami, and top models Candace Swanepoel, Marina Lynchuk, Natalia Chabanenko, and Elisa Sednaoui in Tel Aviv.

Brunel isn't involved with the business on a day-to-day basis, although he owns an 85% stake in MC2. Instead, "Right now he does scouting for [the] agency and takes care of the international relations with other agencies," reports one source. Scouts scour the world for un-agented teenaged girls who could make it as models; they work largely unsupervised and are generally paid a headhunting fee for every girl an agency signs. Even when affiliated with an agency, as Brunel obviously is with MC2, scouts operate mostly independently and with little oversight — even relative to the almost totally unregulated modeling industry itself. "He travels a lot, " says another person who has worked with Brunel. (The company blog refers to Brunel as a "scouting tsunami and MC2 is fairly well-known for the strength of its international scouting.)

Models we spoke to report mostly positive experiences with Brunel — one praised his sense of humor and said he is "lovely to all of his models," and another described him as highly intelligent and cultured, adding, "he knows a lot about the opera and he paints" although it should be noted that none ofthe models whom we spoke to had been told of either his connections with Epstein, or his past.

And what a past it is. These accounts from Michael Gross' 1995 book Model describe Brunel's activities in Paris from the late 1970s onwards, when he worked for, and eventually owned, the modeling agency Karins, now known as Karin Paris:

"Jean-Luc is considered a danger," says Jéröme Bonnouvrier. "Owning Karins was a dream for a playboy. His problem is that he knows exactly what girls in trouble are looking for. He's always been on the edge of the system. John Casablancas gets with girls the healthy way. Girls would be with him if he was the butcher. They're with Jean-Luc because he's the boss. Jean-Luc likes drugs and silent rape. It excites him."

"I really despise Jean-Luc as a human being for the way he's cheapened the business," says John Casablancas. "There is no justice. This is a guy who should be behind bars. There was a little group, Jean-Luc, Patrick Gilles, and Varsano...They were very well-known in Paris for roaming the clubs. They would invite girls and put drugs in their drinks. Everybody knew they were creeps. "

It should be noted that aside from being a professional rival, Casablancas, the founder of the agency Elite, was eventually drubbed out of the industry for his own modelizing. How pervy do you have to be for John Casablancas to call you a perv?

Pervy enough to drug and rape numerous teenagers, according to 60 Minutes and Diane Sawyer, who investigated Brunel in 1988. The program interviewed nearly two dozen models who said they had been sexually assaulted by Brunel and/or by his fellow agent, Claude Haddad. Even at that time, Brunel had a reputation as a man one could go to to procure a "date" with a young model. CBS spoke to five models who said that Brunel and/or his friends had drugged and raped them. Said producer Craig Pyes, "Hundreds of girls were not only harassed, but molested. " When Gross interviewed Brunel, this is what he had to say for himself:

"You get laid tonight with a model, is that a crime? I don't understand why people go into your personal life, what you do yourself, and to yourself, and they don't look at things that are really important. "

Since then, Brunel has been involved with a succession of agencies in New York and Paris. Although the 60 Minutes scandal eventually led Eileen Ford to stop working with him, he continued his involvement with Karins. In 1988, when powerhouse agency Next opened its doors, Brunel took an ownership stake. He also "discovered" Christy Turlington when she was 14. MC2 is only his latest venture. Because no criminal charges were ever filed by any of his accusers, and because the industry has a short memory — most models working today weren't even born when Sawyer and Pyes started looking into Brunel's activities — Brunel has been free to continue as he pleases. A French citizen, he even avoided testifying in his friend Epstein's trial.

And so Brunel is still criss-crossing the globe, trawling for 5'10" 13-year-olds from Eastern Europe and (the whiter parts of) South America. And apparently taking the occasional ride with them on Epstein's private jet. Is there any better argument for the regulation of the modeling industry?

http://nypost.com/201 1/1 1/18/jeffrey-epsteins-level-3-sex-offender-status-upheld-by-ny-appealscourt/

Jeffrey Epstein's Level 3 sex offender status upheld by NY appeals court

By Dareh Gregorian

November 18, 2011 | 5:00am
Multimillionaire perv Jeffrey Epstein may not consider his Florida conviction for soliciting a minor a big deal, but New York does.

A state appeals court yesterday upheld the financier's status as a Level 3 sex offender —meaning he's considered "a threat to public safety" and a "high risk" to offend again.

Epstein, 58, did 13 months in a Florida jail for soliciting a minor to perform a sex act on him during a "massage."

Although he was never indicted or convicted for hiring any other underage girls, the state Appellate Division found there was "clear and convincing evidence" he had indeed done so, making the Level 3 designation appropriate.

http://pagesix.com/2007/10/06/model-shop-denies-epstein-tie/

MODEL SHOP DEMES EPSTEIN TIE

By PageSix.com Staff - October 6, 2007 | 9:00am

THE owners ofMC2 models are denying industry speculation that massage maven Jeffrey Epstein is a secret financial backer of the agency being run by scandal-scarred Jean-Luc Brunei, who was once accused of taking advantage of underage models.

Epstein, who this week agreed to plead guilty to soliciting underage prostitutes at his Florida mansion in a deal that will send him to prison for about 18 months, reportedly gave "millions" to start MC2, which opened in October 2005 with offices in New York, Miami and Tel Aviv. One of the girls Epstein, 54, was accused of soliciting massages from was described in court documents as being just 14.

"E equals MC squared . get it, like the equation? E equals Epstein. He just thinks everyone is too dumb to figure it out," said a model industry insider. "He's a desperate old man that fantasizes and takes advantage of young girls."

The trouble doesn 't stop there.

Karins Models founder Brunel, who's currently a partner in MC2, denied allegations in a 1997 "60 Minutes" segment that he took advantage of young models who were high on drugs. Brunel also reportedly left his Trump Tower digs in 1999 after complaints of night carousing, which he also denied.

Disgraced former Elite models exec Gerald Marie is also involved with MC2, says our source.

Marie was accused of having sex with underage models in a 1999 BBC documentary where he was filmed saying he hoped to seduce contestants in a modeling contest in which the average age of participants was 15. He also dated Linda Evangelista when she was a teen.

"He's also involved in the agency," said the source. "Gerald and Jean-Luc like the same things. They hang out because they have young girls in common, like two guys who enjoy the same wine."

MC2 president Jeffrey Fuller confirmed Brunel was a partner in the company, but denied any working relationship with either Epstein or Marie.

"We have no relationship business-wise with Gerald Marie. Jeffrey Epstein has no ownership or involvement in our company and never has. Jean-Luc Brunel and I are the only two partners and owners of MC2 Model Management," Fuller said.

Epstein's rep said he was not involved in the agency. "He has no business relationship with them," said Howard Rubenstein.

http://www.palmbeachdailynews.com/news/news/lawsuit-documents-link-jeffrey-epsteinto-modeling/nMGzH/

Lawsuit documents link Jeffrey Epstein to modeling agency owner Jean Luc Brunel

By Michele Dar an

Daily News Staff Writer

New court filings in a civil case filed by billionaire sex offender Jeffrey Epstein link Epstein and Jean Luc Brunel, owner of modeling agency MC2.

The documents say MC2 employees told attorney Brad Edwards that Epstein's condos at 301 E. 66th St. in New York City were used to house young models.

Edwards, who has sued Epstein on behalf of several women claiming to be victims of sex abuse by Epstein, was told MC2 brought underage girls in from all over the world, promising them modeling contracts.

"Epstein and Brunel would then obtain a visa for these girls, then would charge the underage girls rent," the documents say.

Through the investigation of his lawsuits against Epstein, Edwards learned Brunel "runs the modeling agency MC2, a company for which Epstein provides financial support," the documents say.

They also allege Epstein tried to thwart Edwards from taking depositions of Brunel, Epstein's companion Guislaine Maxwell, and other high-profile names such as President Bill Clinton.

Details are listed in more than 62 pages filed by attorney Jack Scarola on behalf of Edwards in the lawsuit Epstein filed against Edwards. Edwards represents four of Epstein's minor victims, three of whom have settled their cases with Epstein under a confidential agreement.

Epstein attorneys Christopher Knight and Joseph Ackerman declined to comment Friday on the court filings.

Edwards deposed Brunel, but his attorney delayed it and then said he was back in France with no plans to return. But according to the court papers, Brunel was staying with Epstein in Palm Beach during that period.

The court filings describe Brunel as one of Epstein's closest pals.

Regarding Maxwell, the documents refer to sworn testimony by Epstein's former house manager, Alfredo Rodriguez, explaining how Maxwell took photos of girls without the girls' knowledge, "kept the images on her computer, knew the names of the underage girls and their respective phone numbers and other underage victims."

According to the documents: Maxwell allegedly lied about her mother being ill and having to fly back to England one day before a scheduled deposition in Edwards' case against Epstein. Despite that assertion, Maxwell was captured in a photo for OK magazine, attending the wedding of Chelsea Clinton two days later.

Epstein has settled more than two dozen lawsuits and claims against him by young women who say they were lured to his El Brillo Way mansion as teens to give him sexually charged massages and/or sex in exchange for money. The terms of all settlements are confidential.

Rodriguez took a journal from Epstein's computer that listed the names of his underage victims from around the country and the world. Calling it the "Holy Grail," Rodriguez tried to sell the journal for $50,000 to victims' attorneys. He pleaded guilty to obstruction ofjustice and is serving 1 8 months in federal prison.

Epstein, 57, served 13 months of an 18-month state sentence. He ended his one-year probation in July on state charges of soliciting prostitution and soliciting a minor for prostitution.

According to flight logs from Epstein's private planes, Clinton flew several times on Epstein's planes, many times with Maxwell, Palm Beach resident Sarah Kellen and Adriana Mucinska — "all employees and/or co-conspirators of Epstein's," according to the court papers.

The documents show that Clinton flew with Epstein, "then suddenly stopped — raising the suspicion that the friendship abruptly ended ...

"Epstein's personal phone directory from his computer contains e-mail addresses for Clinton along with 21 phone numbers for him ... and what appears to be Clinton's personal numbers," the court papers say.

Allegations in the documents say Epstein threatened victims — including Edwards' client Jane Doe — despite no-contact orders in effect.

Epstein had Doe tailed by a private investigator as her trial date neared, the court filings say. One time, Doe was so frightened that she fled her home in the company of a retired police officer and was taken to a hiding place, according to the court papers.

http://slaverytoday.org/that-gorgeous-underage-ad-model-may-be-trafficked-and-ownedregulation-for-agencies-to-stop-child-sex-trafficking/

That Gorgeous Underage Model May Be A Slave: Regulation For Agencies To Stop Child Sex Trafficking

First came the knowledge that slaves still existed and were present in larger numbers than ever before. Then the realization that a human being could be purchased within a few hours ofmy home for under $100. Now only a few miles away. In thefollowing years I've been learning the myriadforms, places and types ofslavery. The list keeps lengthening and with each new form (to me), I learn about , it knocks me down, one more time.

Slavery
Debt Bondage
Sexual Slavery
Child Brides
Forced Labor
Child Soldiers
Adoption Trafficking
Organ Trafficking
Trafficked Athletes

And now a new one I should have seen coming.

Those very young, foreign models you see? Some of them were trafficked by model scouts who literally trawled through some ofthe most destitute and vulnerable people on earth for them. The same methods as other predatory traffickers; Go to politically or economically unstable areas; locate 5 '11 " beautiful young girls; buy them, import them, own them, use them.

Horrible irony to have images that portray us to the world possibly be ofslaves.

It 's hard to think ofan area ofour society that doesn 't admire seeing it 's most vaunted members with a model on their arm. While this observation does not imply that those people were trafficked, imagine how simple that makes it to approach a child or it 's family anywhere in the world and offer them this in return for absolute control.

All the traffickers have to do is pull out a magazine or phone with videos on it.

I'm not shocked at traffickers using this method ofpromises to lure unsuspecting girls into slavery, I've seen it, read about it, studied it. I'm in shock that itflourishes in the most visible, glaring spotlight ofour culture, the part that worhips and presents our current idea of beauty in almost everything we touch.

These victims are on the most prominent slave block ever, emulated by our children, coveted by our culture-makers and our society, and standing in the brightest global spotlight in the world. In plain sight, reported on in numerous stories for decades and yet only escalating in usage until they 've become the golden mean.

We can quietly ignore the ones resold daily in our town, who made our clothes, chocolate, housewares, provided the gold on ourfingers and necks, electronics in our hands, labor in our fields. Here, finally, are slaves wefantasize about being, emulating, allow our society to be shaped by, consider trophies.

What will this say about us if we don 't drastically change it? All of it.

Katie Ford walked awayfrom an empire thefirst time she learned about slavery. she 's working to change with this thing she recognized to be permeating the industry. That is courage.

Regulating Modeling Agencies to Help Prevent Child Sex Trafficking

Conchita SarnofT
Posted: 02/10/2012 8:49 pm

In 2010, Jezebel, an online site, published "The Sex Trafficking Model Scout" warning about the dangers of deregulated modeling agencies in the U.S.

Given the growing number of modeling agencies that transport underage teenagers from foreign countries into the United States and the growing sex trade ofunderage girls in the U.S. why does this industry remain deregulated?

Since the advent of this business, modeling agencies have had free reign to scout teenagers from every state in the country as well as every nation in the world. Many of these teenage girls come from economically disadvantaged families and are offered none to very limited protection while traveling and working as "models."

Jezebel reported that Jean Luc Brunel, one of the cast of characters involved in the ongoing Jeffrey Epstein (a level 3 registered sex offender), eight-year-long case, has been working for over two decades with a succession of agencies in New York and Paris. According to media reports, Diane Sawyer produced a segment for CBS's 60 Minutes featuring a sex scandal that eventually led Eileen Ford (founder of renowned Ford modeling agency) to stop working with Brunel.

Brunel's latest venture is the modeling agency MC2 based in South Beach, Fla. with satellite offices in New York and Tel Aviv. Since his agency is deregulated and "no criminal charges have been filed by any of his accusers" although many have tried to serve him including lawyers representing Epstein's victims, Brunel continues to hide behind his French citizenship to prevent depositions. "Trawling for 5' I I " underage teenagers to work for his agency, MC2, or anyone else who requests, Brunel is free to scout for very young girls without limitations." Given his citizenship he also successfully avoided deposition in Epstein's sex related cases.

Like so many other reporters who have tried to report his side of the story when Jezebel contacted Brunel, "he did not respond to our interview request." According to Jezebel:

we spoke to a number of people who worked with his agency and while MC2 isn't considered a major industry player, it isn't exactly bottom-shelf, either.. . Brunel isn't involved with the business on a day-to-day basis, although he owns an 85 percent stake in MC2. Instead, he does scouting for the agency and takes care of the international relations with other agencies, reports one source. Scouts scour the world for unrepresented teenage girls who could make it as models. They work largely unsupervised and are generally paid a headhunting fee for every girl an

agency signs. Even when affiliated with an agency, as Brunel obviously is with MC2, scouts operate mostly independently and with little oversight. The company blog refers to Brunel as a 'scouting tsunami' and MC2 is fairly well known for the strength of its international scouting.

Model, Michael Gross's 1995 book, describes Brunel's activities in Paris from the late 1970s onwards, when he worked for, and eventually owned, the modeling agency Karin. "Jean-Luc is considered a danger," says Jéröme Bonnouvrier. "Owning Karin was a dream for a playboy. His problem is that he knows exactly what girls in trouble are looking for. He's always been on the edge of the system."

John Casablancas, founder of Elite modeling agency said:

I really despise Jean-Luc as a human being for the way he's cheapened the business. There is no justice. This is a guy who should be behind bars. There was a little group, Jean-Luc, Patrick Gilles, and Varsano. They were very well known in Paris for roaming the clubs. They would invite girls and put drugs in their drinks. Everybody knew they were creeps." Casablancas was a professional rival who was pushed out of his agency for questionable concerns.

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Her interest in human trafficking began when a representative of the United Nations called to ask if she would participate in a women's leadership group that was studying the issue of trafficking. "I said, 'I can't come talk about it, because I don't know anything about it! '" Ford recalls. "But I went, and after two hours, I knew why I was there. The way people traffic across borders is parallel to the way we recruit models. According to Ford "the target age is 14 to 24, and so it's similar to modeling." I knew how to reach that market" she said, "It was the feeling of: There but for the grace of God. The girls who came to us could have been those girls." http://slaverytoday.org/that-gorgeous-underage-ad-model-may-be-trafficked-and-ownedregulation-for-agencies-to-stop-child-sex-trafficking/

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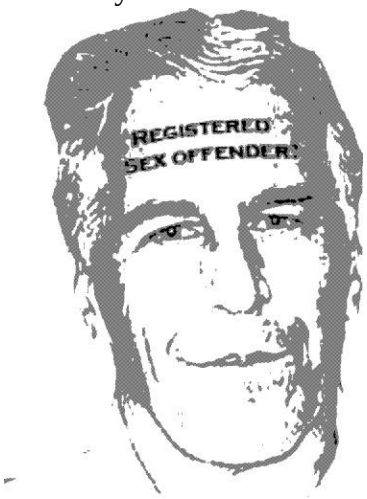
http://files.wallstreetfolly.com/wordpress/2007/10/jeffreyepstein-doesnt-want-to-be-branded-as-a-sex-offender-forlife-and-no-hes-not-a-modeling-agency-secret-sugar-daddyor-so-its-owners-say/

Jeffrey Epstein doesn't want to be branded as a "sex offender" for life and no he's not a modelin a enc secret su ar dadd or so its owners sa

Posted by WSF On October - 9 - 2007



Jeffrey Epstein, the billionaire money manager who's agreed to plead guilty to soliciting underaged hookers and go away for 18 months, doesn't want to be branded a "sex offender" for life. Page Six says his lawyers are thinking about asking prosecutors to drop that requirement from his plea agreement:

In a letter drafted, but not sent, to U.S.
Attorney Alexander Costa and obtained by Page Six, Epstein's lawyer, Gerald Lefcourt, writes, "Doing so will have a profound impact [on Epstein] both immediately and forever after. Not only will he be restricted to a wholly inappropriate penal facility, but he will be required for the rest of his life to account for his whereabouts. "

Meanwhile, over the weekend Page Six said that owners of MC2 modeling, run by Jean-Luc Brunel — who's also been accused of favoring underaged models in the past — claim that Epstein is not the secret deep pockets behind the firm, no matter what others say or speculate.

Epstein, . ..reportedly gave
"millions" to start MC2, which opened in October 2005 with offices in New York, Miami and Tel Aviv. One of the girls Epstein, 54, was accused of soliciting massages from was described in court documents as being just 14.

"E equals MC squared . . get it, like the equation? E equals Epstein. He just thinks everyone is too dumb to figure it out," said a model industry insider. "He's a desperate old man that fantasizes and takes advantage of young girls. "

"Jeffrey Epstein has no ownership or involvement in our company and never has. Jean-Luc Brunel and I are the only two partners and owners of MC2 Model Management," [Jeffrey] Fuller said. [MC2 President]

http://www.washingtonpost.com/news/volokh-conspiracy/wp/2014/04/21 [eleventh-circuit-rules-that-discovery-can-move-forward-on-my-crime-victims-rights-act-case/

The Volokh Cons iracv

Eleventh Circuit rules that discovery can move forward on my Crime Victims' Rights Act case

ByPaul Cassell April 21

On Friday,the I Ith Circuit ruled that discovery can move forward in an imponant Crime Victims' Rights Act case that my co-counsel, Brad Edwards, and I are pursuing. The narrow issue before the court was whether prosecutors and defense attorneys could assert some sort of "privilege" to prevent crime victims from reviewing the correspondence that lead to a plea bargain. More broadly, the ruling means that the victims will have a chance to return to the district court and seek to invalidate a plea agreement that (we alleged) was consummated in violation oftheir rights. I hope that the case will ultimately set an important precedent that federal prosecutors can't keep victims in the dark about the plea deals that they reach.

Here are the important facts, taken from the I Ith Circuit's opinion: The case arose in 2006, the FBI began investigating allegations that wealthy investor Jeffrey Epstein had sexually abused dozens and dozens of minor girls. The U.S. Attorney's Office for the Southern District of Florida accepted Epstein's case for prosecution, and the FBI issued victim notification letters to my two clients, minors Jane Doe No. I and Jane Doe No. 2, in June and August 2007. Extensive plea negotiations ensued between the prosecutors and Epstein. On Sept. 24, 2007, the prosecutors entered into a non-prosecution agreement with Epstein in which they agreed not to file any federal charges against Epstein in exchange for his guilty plea to minor Florida offenses (e.g., solicitation of prostitution). Not only did the prosecutors neglect to confer with the victims before they entered into the agreement with Epstein, they also concealed its existence for at least nine months. For example, the prosecutors sent post-agreement letters to the victims reporting that the "case is currently under investigation" and explaining that "[t]his can be a lengthy process and we request your continued patience while we conduct a thorough investigation."

On June 27, 2008, the prosecutors informed my co-counsel, Brad Edwards, that Epstein planned to plead guilty to the Florida charges three days later. But the prosecutors failed to disclose that Epstein's pleas to those state charges arose from his federal non-prosecution agreement and that the pleas would bar a federal prosecution. As a result, the victims did not attend the state court proceedings.

On July 7, 2008, Edwards and I filed a petition alleging that Jane Doe No. I was a victim of federal sex crimes committed by Epstein and that the United States had wrongfully excluded her from plea negotiations. We also alleged that the federal prosecutors had violated her rights under the Crime Victims' Riohts Act (CVRA) — specifically her rights to confer with the government, to be treated with fairness, to receive timely notice of relevant court proceedings, and to receive information about restitution. The United States responded by claiming that it used its "best efforts" to comply with the rights afforded to victims under the CVRA, but that the act did not apply to pre-indictment negotiations with potential federal defendants.

After Jane Doe No. 2 joined the initial petition, the district court (Marra, J.) found that both women qualified as "crime victims" under the CVRA. The district court later rejected the government's argument that the act only applies after the filing of a federal criminal indictment. (I've written a law review article about the issue of how early crime victims' rights attach in the criminal process, which can be downloaded here.)

Among other relief, we sought rescission ofthe non-prosecution agreement as a remedy for the violation of the victims' rights. To make the case for such a remedy, we moved for discovery of the correspondence between the U.S. and Epstein's attorneys during the plea negotiations. Epstein 's attorneys intervened, arguing that Federal Rule of Evidence 410 and Federal Rule of Criminal Procedure I I create a privilege for plea negotiations, barring release of the correspondence. They also argued that the court should find that the materials were protected under the work product doctrine or, alternatively, should be protected under a new "commonlaw privilege for plea negotiations."

The district court first med that rescission of the lea aoreetnent was a ossible remed under the act. The court then ruled that we were entitled to review the correspondence, rejecting all of Epstein's arguments.

On Friday, the I Ith Circuit affirmed the district court's rulin that we could review the lea corres ondence. At pp. 18-22 of its published opinion, the court concluded that there was no basis for restricting access to such correspondence when crime victims have a legitimate need to review it. The court rejected, for example, the work product argument because plea discussions are not confidential:

Disclosure of work-product materials to an adversary waives the work-product privilege. See, e.g., In re Chrysler Motors Corp. Overnight Evaluation Program Litig., 860 F.2d 844, 846 (8th Cir. 1988); In re Doe, 662 F.2d 1073, 1081-82 (4th Cir. 1981). Even ifit shared the common goal of reaching a quick settlement, the United States was undoubtedly adverse to Epstein during its investigation of him for federal offenses, and the intervenors' disclosure of their work product waived any claim of privilege. . . .

The court also declined to recognize a new privilege for plea bargaining, finding the relationship between prosecutors and defense attorneys did not need special protection:

As a last-ditch effort, the intervenors contend that "[i]f more is needed in addition to the plain language of Rule 410 to preclude disclosure of the correspondence to plaintiffs, it can be found in the conjunction of Rule 410, the work-product privilege, and the Sixth Amendment right to the

effective assistance of counsel in the plea bargaining process," but this novel argument fails too. As explained above, Rule 410 does not create a privilege and the intervenors waived any work-product privilege. The intervenors concede too that the right to counsel under the Sixth Amendment had not yet attached when the correspondence was exchanged. Lumley v. City of Dade City, Fla., 327 F.3d 1186, 1195 (1 Ith Cir. 2003) ("[T]he Sixth Amendment right to counsel ordinarily does not arise until there is a formal commitment by the government to prosecute," such as a "formal charge, preliminary hearing, indictment, information, or arraignment."). The "conjunctive" power of three false claims of privilege does not rescue the correspondence from disclosure. . . .

The Supreme Court has identified several considerations relevant to whether a court should recognize an evidentiary privilege—the needs of the public, whether the privilege is rooted in the imperative for confidence and trust, the evidentiary benefit ofthe denial of the privilege, and any consensus among the states, Jaffee v. Redmond, 518 U.S. l, 10—15 (1996)—but none of these considerations weighs in favor of recognizing a new privilege to prevent discovery of the plea negotiations. Although plea negotiations are vital to the functioning of the criminal justice system, a prosecutor and target of a criminal investigation do not enjoy a relationship of confidence and trust when they negotiate. Their adversarial relationship, unlike the confidential relationship of a doctor and patient or attorney and client, warrants no privilege beyond the terms of Rule 410. See Jaffee, 518 U.S. at 10. But the victims would enjoy an evidentiary benefit from the disclosure of plea negotiations to prove whether the United States violated their rights under the Act.

Moving forward, this case raises the important issue of what kinds of remedies are available for violations of the Crime Victims' Rights Act. Our complaint alleges that, prodded by Epstein, the federal prosecutors deliberately concealed the sweetheart plea deal they had reached with him to avoid public criticism of the deal. I am hopeful that in future district court proceedings, we will be able to prove that clear violation of the CVRA and then obtain the remedy of invalidating the illegally-negotiated plea deal.

Paul G. Cassell teaches criminal law, criminal procedure, and crime victims' rights at the S.J. Quinney College of Law at the University of Utah. Before coming to Utah, he was President of the Stanford Law Review, a law clerk for then-Judge Antonin Scalia on the D.C. Circuit and for Chief Justice Warren Burger of the Supreme Court, an Associate Deputy Attorney General with the U.S. Justice Department (1986-88), and an Assistant U.S. Attorney for the Eastern District of Virginia (1988 to 1991). Cassell joined the faculty at the University ofUtah College of Law in 1992, where he taught full time until he was sworn in as a U.S. District Court Judge for the District of Utah in 2002. In 2007, he resigned his judgeship to return full time to the College of Law, to teach, write, and litigate on issues relating to crime victims' rights and criminal justice reform.

-------- Original message--------
From: Jolanta MODILINOS
Datel 5/10/2014 4:46 PM
(GMT+02:OO) To: Jean Luc Brunel
Subject:

Dear Jean Luc,

Hope that you stay fine.

As per our conversation about placement of her with you in NYC and Miami, she said she found some article in internet , which changed her position and she preferred to be placed with another agency..

I am so sorry, but people believes in media more than in us sometimes, what is sad!

Warmest regards

Jolanta Sadauskiene

owner

MODILINOS model agency MODILINOS models
Parodos 7-4, Kaunas Sv.Stepono 7, Vilnius

tel/fax.•+37037323257 cell:+37069816103

io/anta@modi/inos.com info modilinos.com
www.modilinos.com

EXHIBIT B

From: "Vladimir Yudashkin @ 1 MotherAgency"
Date:17/10/2014 10:46 AM (GMT+02:OO)
To: Jean Luc Brunel
Subject: The situation with Liza Zazdravnih

Dear JeanLuc,

Unfortunately I need to announce that Liza Zazdravnih rejected signing the contract with MC2 in United Sates. Initially she intended to sign the contract, but later on she came across that article in internet about you involved in illegal activities with young models. This information somehow changed her intentions completely. she is ready to be a model and consider contracts with other agencies, but she has suspicions that you will force her to illegal activities and she made the decision to don't put her self in risk.

Lets keep in touch. I will be happy to work with you next time if we have another right model for you. 1m upset that it didn't work out with Liza

Sincerely,
Vladimir

Vladimir Yudashkin
Director

EXHIBIT C

-------- Original message --------
From: Manuela - Mega Partners
Date:17/10/2014 9:36 PM (GMT+02:OO)
To: Jean Luc Brunel
Subject: MC2

Dear Jean Luc,

I'm very happy to hear you're coming to the agency with Vini so we can talk about us working with MC2 again.

I don't need to remind you that the sex trafficking allegations have stopped us from working with your agency for the past 5-6 years — but as Vinicius is my friend, I will try to find a girl that already knows and trusts him to place with you.

Thank you very much for the lovely bag and we'll see each other on fashion week.

Kisses,

Manuela

MANUELA W MARTINEZ
International Relations
Phone: +55 11 3818.4800
Direct: +55 11 3818.4827

M E GA cell.: +55 98668.0090

EXHIBIT D

PARTNERS megamodelbrasil.com.br Original Message-——

From: Lorraine <lorraine@mc2mm.com>
Organization: MC2 MM
Reply-To: <lorraine@mc2mm.com>
Date: Friday, August 27, 2010 at 8:49 PM
To: <jeff@mc2mm.com>, Jean Luc Brunel <jeanluc@mc2mm.com>, Pink <pink@mc2mm.com>
Subject: FW: Press Inquiry from AFP (Agence France Presse) Videographer--Michelle Stockman

Original Message-----

>From: Michelle STOCKMAN [mailto:Michelle.Stockman@afp.com]
>Sent: Friday, August 27, 2010 1 1 AM
>To: lorraine@mc2mm.com
>Subject: Press Inquiry from AFP (Agence France Presse)
>Videographer--Michelle Stockman

>My name is Michelle Stockman and I am a video journalist for Agence France
>Presse, the French newswire. We produce 1.5 to 2 min. videos that are
>distributed internationally to broadcast clients in Europe and Asia, and
>internet clients worldwide. In preparation for Fashion Week, my print
>colleague and I are interested in doing a piece on trends in casting >models
>0f color. I was wondering if you could refer me to a model of color and a
>casting director who can comment on her experience.

>My deadline is next week, so I would like to set something up for Monday
>or
>Tuesday. I can come to you as I am a one-person camera crew. When you
>have
>a moment, please let me know. I'd be happy to discuss with you over the
>phone ahead of time.

>Best regards,
>Michelle Stockman

EXHIBIT E

>Michelle Stockman
>747 Third Avenue, 35th Floor
>New York, NY 10017

EXHIBIT F

>917-533-3261
>www.youtube.com/AFP

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> 165
>countries. We publish worldwide in English, French, Spanish, German,
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>intended
>solely for the use of the individual or entity to whom it is addressed. If
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>the email from your system. If you are not the named addressee you should >not
disseminate, distribute or copy this email.

>For more information on Agence France-Presse, please visit our web site at
>http://www.afp.com

EXHIBIT E

Sent from Samsung Mob"e

— Original message — From:
Michael Sanka
Date:12/12/2014 12:48 (GMT-05:OO)

To: Jean Luc Brunel
Subject: Scouting

Jean Luc,
How are you?
After so many years scouting for you and having a great network of agencies all around the world who enjoy to work with us, i wanted to let you know that we are on the way to lose everything we build and we are gonna have big problem now.

Agencies, still want to work with us but parents don't want their daughters to come to us, because when they google your name and the agency name the only things they see is "Sex Trafficking"!!!

It's impossible to sign a new girl and if nothing it's done i can tell you that in 3 months we we will not get any new girls and i don't see how the agency will work without new faces.

All the agencies who know you don't have any problems with you since they all told me "We know Jean Luc for more than 20 years and all those years we had so many girls place with him who had better experience than in any other agencies who were representing them as well and we never had any problems whatsoever, all our girls had great carriers as a model when he represented them".

I understand those agencies because it's hard for them to talk to parents and explain that it's not the truth when it's all over the internet.

You need to have it stop and have the people write an official letter to say that it's not the truth...

I will keep you posted of course but it's really bad for us and the scouting.

Best regards

Michael Sanka
3104021028

FOX
FASHION AGENCY

EXHIBIT F

Attn: Scouting division MC2
We took notes of your comments and the girls that you like on our website.

We know Jean Luc Brunel and we always work with him since more than 10 years all those years and never had any problems.
All the girls he represented from us never had any problems. they were working have great book work with good clients in editorial and campaigns and were well represented models.

Now for all the new faces we have. we needed to talk to their parents to discuss about mc2 and you interest to represent their daughters and of course they google it and saw all the bad articles about sex trafficking they were scared and I was Inyself' speechless since we know that it's not true but it was hard for us to explain to the parents.

So of course for the moment till all is clarified we can't place any new faces with you because the parents will refuse and it makes us look bad to propose the girls to your agency.

We are sorry but you really need to clarify everything, till then we will have to cease any collaboration and we will have to refuse to let you represent any of our models.

Sure you understand.

Sandra Petkanic
Fox Fashion Agency

www.foxmodeL com e-mail: foxoffice@sezampro.yu

Beograd 11000: Svetogorska 35 v, stan 12 Tel.: +381 11 3346414: tel./fax: +381 11 3226202

EXHIBIT G

1 Q As part of your employment with MC Square

2 did you live in New York, for a time?

3 I'm sorry, but I take the Fifth.

4 Q Eave you ever heard any model of MC Square 5

who at the time of being a minor, that means under

6the age of eighteen, made an accusation that

7Jean—Luc Burnel acted inappropriate with her? 8 Never. And

that is something that I will 9 not answer. Ana I said never

because even when 10 peoples come anci ask me I will always

say the truth

11 regarding that.

12 I know Mr. Brunei for the longest__

13 maybe eight years Anci always said what I know.

14 I never saw and I never knew that he did anything.

15 So I know that. And that's the truth. 16 Never .

I never heard anybody accusing Mr. Brunel 17 or

complaining about Mr. Brunei. Nothing .

18 Q That means — that means at any time no 19 model , no

minor model came to you and said, you 20 know , "Maritza,

look what just happened to me" , that, 21 something bad

happened to me" .

22 Maybe a model came and told me, "Maritza,

23 look what happen to me . I don't have any money, or

24"I don't have a place to live" Or, "Look, I didn ' t

EXHIBIT

25 get my ticket" , or whatever.

H-1

1 a

2 MR. OBRONT: Well, I would object, Because

3 of circumstances.

4 BY MR. DAVID•

5 Q But you said before that you never heard

6 anything that would indicate that Jean—

Luc Burnel 7 behaved inappropriately with

with any mociels, 8 especially any minor

models that MC Square may have

9 had.

Is that correct?

1 Yeah, I said what is the truth. Nob2 complain to

me. Nobody your question was very 3 clear, has any girl

came to you and complain about 4 sexually, you know,

involved with Mr. Brunei.

5 Right .

6 And my answer was no Nobody came to tell 7

me . I never saw. I never knew . His

personal life 8 was not my problem.

9 Do you have any actual knowledge, that i 3

0 to say were you present did you see with your own 1

eyes, any minor models go with Jean-Luc Burnel to 2

Jeffrey Epstein's home, or any party of his?

MR.OBRONT : Obi ect ion .

THE WITNESS : I'm sorry, but I take the

EXHIBIT

Fifth.

COMPOSITE

EXHIBIT I

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

FILED

Case No. F07-0933
Judge Scholesinger

STATE OF FLORIDA,

Maritza Vasquez, Defendant

PLY、、(|、1

COMES NOW KATHERINE FERNANDEZ RUNDLE, State Attorney of the Eleventh Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, and enters the following agreement with the Defendant, to wit: that the Defendant shall plead guilty to Count one (1) and be adjudicated guilty, while Count two (2) will be nolle prossed and the Defendant will be sentenced as follows:

1. One (1) years Community Control followed by nineteen (19) years probation with the special condition of restitution of $98,000.00 to Kam Models, LLC at a minimum monthly payment of $250.00 a month.

2. The Defendant shall be eligible for early conversion of the Community Control to probation upon payment to the victim through the Department of Corrections of $25,000.00 to satisfy the restitution.

3. The Defendant shall be eligible to early conversion of the probation to summary probation after a period of two (2) years of either community control or probation if the restitution is paid in full.

4. The Defendant shall be eligible to early termination of probation after three (3) years if the restitution is paid in full.

Entered into this 8 day of November 2007, in Miami-Dade County, Florida.

Respectfully submitted,

KATHERINE FERNANDEZ RUNDLE
STATE ATTORNEY

By: Thomas W. McGee
Assistant State Attorney
Fla. Bar # 325581

Maritza Vasquez
Defendant
~~Florida Bar # 123589~~

Court Officer - Esquire
Attorney for the defendant
Florida Bar #

Judge Scholesinger
Circuit Court Judge

EXHIBIT |

DIVISION

CASE NUMBER

ORDERS OF SUPERVISION

STATE OF FLORIDA

vs

DEFENDANT

COUNT

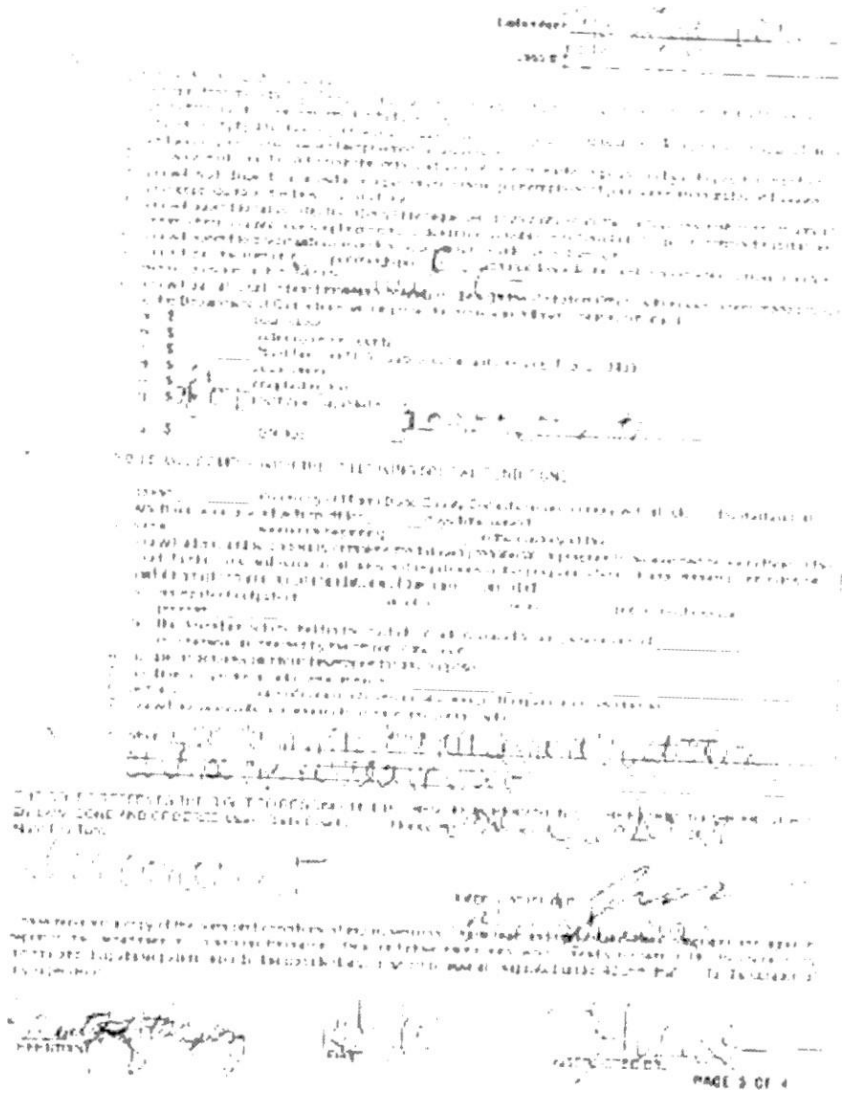
ORDERS OF SUPERVISION

PROBATION

COMMUNITY CONTROL

THE COURT ORDERS

EXH 旧一



EXH 仃 I

FILED

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA FALL TERM, 2000

THE STATE OF FLORIDA v

[illegible]

Defendant

INFORMATION FOR

1. GRAND THEFT [illegible]
2. ORGANIZED FRAUD - SCHEME TO DEFRAUD [illegible] OR MORE
[illegible]

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

KATHERINE FERNANDEZ RUNDLE, State Attorney of the Eleventh Judicial Circuit, prosecuting for the State of Florida, in the County of Miami-Dade, by and through the undersigned Assistant State Attorney, under oath informs and says that:

McCOY THOMASON [illegible]
Circuit Civil Division
Fla. No. [illegible] Bar [illegible] [illegible] W.F. DOB [illegible] 554

[illegible]

Signature [illegible]

COUNT 1

MARITZA VASQUEZ, on or between May 21, 2004 and June 30, 2006, in the County and State aforesaid, did knowingly, unlawfully and feloniously obtain or use or endeavor to obtain or use U.S. currency, the property of KARIN MODELS USA, LLC and/or JEAN LUC BRUNEL and/or JEFF FULLER as owner or custodian, with the intent to deprive the owner of a value of $100,000.00 or more, with the intent to either temporarily or permanently deprive KARIN MODELS USA, LLC and/or JEAN LUC BRUNEL and/or JEFF FULLER of a right to the property or of a benefit therefrom, or to appropriate the property to said defendant's own use or to the use of any person not entitled thereto, contrary to s. 812.014(1) and (2)(b), Fla. Stat., contrary to the form of the Statute in such cases made and provided, and against the peace and dignity of the state of Florida.

COUNT 2

And the aforesaid Assistant State Attorney, under oath, further information makes MARITZA VASQUEZ, on or between May 21, 2004 and June 30, 2006, in the County and State aforesaid, did unlawfully and feloniously engage in a scheme to defraud as defined by s. 817.034(3)(c), Fla. Stat., by engaging in a systematic, ongoing course of conduct with intent to defraud one or more persons, to wit: PARIS MODELS USA, LLC and/or JEAN LUC BRUNEL and/or JEFF FULLER, by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act, and to the obtaining property, to wit: U.S. CURRENCY, of an aggregate value of $50,000.00 or more, the property of PARIS MODELS USA, LLC and/or JEAN LUC BRUNEL or and/or JEFF FULLER, as owner or custodian, in violation of s. 817.034(4)(a)1, Fla. Stat., contrary to the form of the Statute in such cases made and provided, and against the peace and dignity of the State of Florida.

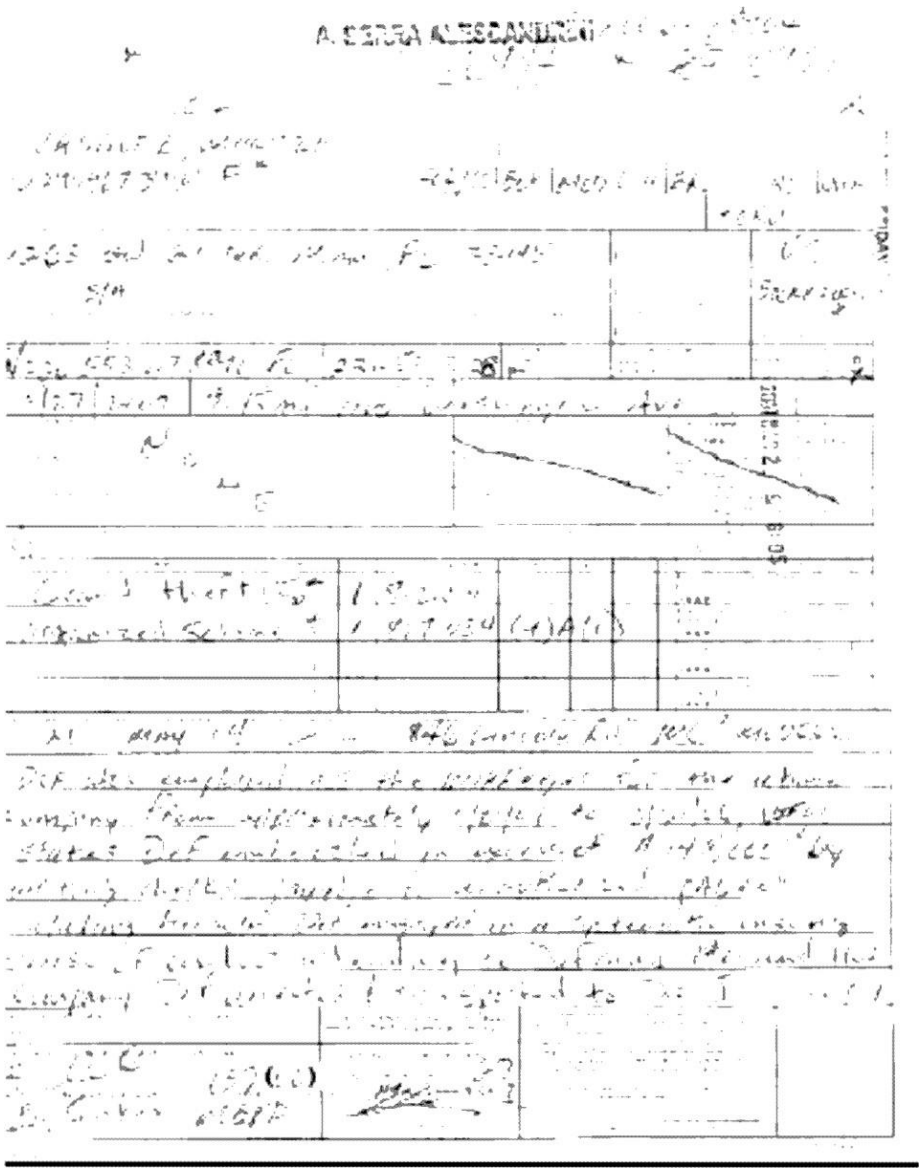
STATE OF FLORIDA, COUNTY OF MIAMI-DADE:

Personally known to me and approved notice as the Assistant State Attorney of the Eleventh Judicial Circuit of Florida whose signature appears below. Being first duly sworn says that the allegations set forth in this Information are based upon facts which have been sworn to or verified by him in his official capacity, and that the facts and allegations contained herein are true and correct to the best of his knowledge and belief.

Assistant State Attorney, Bar # [illegible]
[illegible]

Sworn to and subscribed before me this [illegible] day of April, 2005

By: [illegible]
Notary Public, State of Florida



EXЮB[TI

COMPOSlTE

EXHB!T J

VISA

Department of Homeland Security
U.S. Citizenship and Immigration Services

I-797B, Notice of Action

THE UNITED STATES OF AMERICA

RECEIPT NUMBER EAC 11 194-51607	CASE TYPE 1129 PETITION FOR A NONIMMIGRANT WORKER
RECEIPT DATE June 24, 2011 — PRIORITY DATE	PETITIONER MC2 MODELS MIAMI LLC
NOTICE DATE September 6, 2011 — PAGE 1 of 1	

LUIS FONT ESQ
FONT LAW GROUP PA
1440 HOLLYWOOD BLVD SUITE 415
HOLLYWOOD FL 33021

Notice Type: Approval Notice
Class: O1
Valid from 10/01/2011 to 09/30/2014
Consulate: PARIS

The above petition has been approved, and notification has been sent to the listed consulate. You may also send the tear off bottom part of this notice to the worker(s) to show the approval. Please contact the consulate with any questions about visa issuance. THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA.

Petition approval does not authorize employment. When the workers are granted status based on this petition they can then work for the petitioner, but only as detailed in the petition and for the period authorized. Please contact the IRS with any questions about tax withholding.

If circumstances change, the petitioner can file Form I-929 requesting we notify another consulate of this approval. If any of the workers are already in the U.S. the petitioner can file a new Form I-129 to seek to change or extend their status based on this petition. Changes in employment also requires a new petition. Include a copy of this notice with any other required documentation.

The approval of this visa petition does not in itself grant any immigration status and does not guarantee that the alien beneficiary will subsequently be found to be eligible for a visa, for admission to the United States, or for an extension, change, or adjustment of status.

Number of workers: 1

Name	DOB	COB	Class	Consulate or POE	OCC Code
BRUNEL, JEAN LUC DIDIER HENRI RENE	09/18/1946	FRANCE	O1	PARIS	120

Please see the additional information on the back. You will be notified separately about any other cases you filed.
U.S. CITIZENSHIP & IMMIGRATION SVCS
VERMONT SERVICE CENTER
75 LOWER WELDEN STREET
SAINT ALBANS VT 05479 0001
Customer Service Telephone: (800) 375-5283
Form I797B (Rev. 09/07/93)N

Please tear off portion below and forward it to the alien worker.

The alien may use this portion when applying for a visa at an American consulate abroad, or if no visa is required, when applying for admission to the U.S.

Receipt: EAC 11 194 51607 — Case Type: 1129
Notice Date: September 6, 2011 — Petitioner: MC2 MODELS MIAMI LLC
Petition Validity Dates: 10/01/2011 through 09/30/2014 — Number of Workers: 1

Name	DOB	COB	Class	Consulate or POE	OCC Code
BRUNEL, JEAN LUC DIDIER HENRI RENE	09/18/1946	FRANCE	O1	PARIS	120

SUPPORTING DOCUMENTS

EXHIBIT 1	Several press and meda articles documenting the rise 0t South Beach as one ot the United States' main fashion capitals.
EXHIBIT 2	Press articles regarding the models and actresses who were both discovered by ond careers were launched by the beneficiary, jean Luc. Brunei.
EXHIBIT 3	Several attic-les regarding the prest;gtous repu:ation of Kann Models as formerly one of the world's leading agencies.
EXHIBIT 4	A list of all of MC 2 's ciients. including several high-profile compotgns featuring some of MC 2's fashion models. as well as several press clippings regarding this prestigious and reputable modeling agency.
EXHIBIT S	Yne beneficiary's Jean Luc Brunet. impresseve curriculum vitae. veöfying his tremenaous accomplishrnents tn 00th the fashion and modeling industries.
EXHIBIT 6	Severa articles regarding the 2004 Moaeis New Generation Contest (including translations) os well as the beneficiary's leading role within this prestigious modeling event,
EXHIBIT 7	Several press DE tides regarding the prestigious 2006 Models New Generation Competition (including translations), as we;l as the beneficiary's Jean Luc Brunei, leading role within the event,
EXHIBIT 8	letter of Claudia Middo. President of Mode!work, a renowned modeling agency.
EXHIBIT 9	letter of Allo Amantova, Direct0! of Figaro International Managemen!.
EXHIBIT 10	Several press artic:es reflecting the pres'ige and high circulation rates of the mentioned magazines and periodicals which have featured and covered the modeling events which the beneficiary. Jean Luc Brunei, has organized throughout the years-
EXHIBIT 1 1	Information regarding the cxtreme\y successful and prestigious modeling and fasnicn association. International Model Talent Association (IMTA}.

mc2

MODELSM/AMI

July 25. 2014

Deportment of Homeland Security
United States Citizenship and Immigration Services
Vermont Service Center
30 Houghton Street
Saint Albans. VT 05478

RE: 1 • 129, Petition for a Nonimmigrant Worker
O- 1 Extraordinary Ability as an Art Director and Talent Coordinator
Petitioner: MC2 Models Miami, LLC
Beneficiary: Jean-Luc Didier Henri-Rene BRUNEL

Dear Sit / Madam:

The presenf lette and its enclosures are submitted in support of the attached 0-1 petition of MC 2 Models Miami, LLC, on behalf of Mr. Jean Luc Brunet, The petition is based upon Mr. Brunei's standing as an "Alien of Extraordinary Ability in Art Direction and Talent Coordination." Kindly note that Mr. Bruner currently holds 0-7 status with our organization.

The South Florida area and Miami Beach in particular have become a mecca for the fashion and modeling industries. AS a result. many of the largest international modeling agencies such os Ford, Elite. and MC 2 have opened offices in South Beach and the area has become one of the most important in the modeling industry. In fact, Miami Beach has become second only to New York City in terms of employment opportunities foc fashion models in the United States. Attached as EXHIBIT please find several press and media articles documenting the rise of South Beach as one of the United States' main fashion capitals.

In 1996. our company, MC2 (formerly Karin Models), established an office in the heart of the historic Art Deco District ot Miami Beach. "South Beach" has truly become one of the world's modeling capitals and we are pleased to be a

port of it Our agency has developed a highly distinguished reputation in the modeling industry. We specali•ze in representing numerous models of international acclaim. Having discovered faces such as Christy Turlington, and molded the careers of celebities such as Sharon Slone. Esteua Warren. Milla

mc2Uli-:deis • rc,ad • suite 500 • beach Il 33139
305 672 830() • tax 305 F. '$1 8332 • 305 E?? ?672 • fax 305 672 0332
r•nr.2mm

Jovovich. Jerry Hall and Rebecca Romijn, who is currently starring in the awardwinning ABC television series. Ugly Betty; MC 2 models are among the most sought after in the industry. as evidencea by the caliber ot their comrnercial and editonal bookings. Many of our fashion models have graced the pages of leading fashion magazines of the United States. Europe. latin America. Africa. and Australia such as Vogue. Teen Vogue, Elle. w. Glamour, V. Mane Claire, Surface and Cosmopolitan os well as many more throughout the world. In add;tion to our Miami Beach office, MC2 Models has offices jn New York City and Tel Aviv, Israel

As Artistic Düecfor and Talent Coordinator tor MC2 Models Miarnj. LtC. Mr. Brumes witl be responsible for overseeing the artistic aspects of the agency. By overseeing the art deportmenl In the agency. Mr. Brunei will direct the visual marketing cf the rnodels to clients. focusing on the images placed on both the model's composite cards and ther portfolios, Both of these marketing tools are cruciai in marketing fashron models to their appropriate catalog. editorial, Of media clients. As Artistic Director and Talent Coordinator. Mr. Brund will OiS0 coordinafc the painrg ot tash\on models with a particular photographer, Clients toc the agency include a myriad of fashion publications, retail stores, consumer Pf0duct companies. and fashion houses 10 name but a few. Recruitment of taiented artistic photographers who nave an excellent understanding of the "ins and outs" of the modeling and fashion industry is critical 10 the successful running of a top-modeling agency such as MC 2 MOdeIs Mr. Brunet Will also continue with his amazing track record of discovering the world's greatest talents and beauties in order to sign them w:th MC2 Models. Mr. Brunel wili contir to travel around the world looking for new talents, and to ogencies around the world in order to establish relationships with those agencies and allow MC 2 Models Miami. LLC to represent them in the Unded States.

Mr Brune!'s impressive qualifications as an Art Director and Talent Coordinator. establish eligibility as to 'he regulatory standards for such c:ossification as a top professionoi in his field- Mr. Brunei meets the 0-1 critereo as an individual ot extracydinory ability in the Arfs and Entertainment field as well as a business entrepʳeneur. MC2 Modes Miami. LLC is presently seeking a sophisticated art director and talent coordinai0% After reviewing his expertence and accolades. we ore confident that the benef:ciary, Ml. Jean Luc Brunel will perform said funcfron with outstanding skill and professionalism.

I. MR. "UNEVS QUALIFICATIONS AS THE BENEFICIARY

In adaitior, to Jean Luc Brunel's extensive bustness qualifications. his career os an individual with artistic vision and creative talents Qualifies him as an 0-1 aåen in the Arts and Entertainment Field His au- encompassing experjence os an Art Director, talent Coorainotor. ir.!erna.'ional entrepreneur and busness ieader in the modeling, fashion. entertainment. public relations, restaurant. and tourism industries has made Mr. Brunel internationally renowned in those fields. Among his various accomplishments throughout his career are the successful modeling agencies he has founded both in Europe and in the United States For example. in 1978, Mr. Brunel founded and grew Karin Models Paris from the ground up to become a lead-market agency with o world-wide presence. Capturing a strong market share in Pans. Mt. Brunel successfully created Karin Models as a platform tor marquee clients to obtain sophisticated public relations services and important modeling contract oppoctunities. Mr. Bruners success was so great with Karin Pans that in the next ten years, he founded Next Mode' Management in Los Angeles. Californio in)980. Next Model Managemenf in Miami. Florida in 1982, Mode' Management Group also in M;arni, Florida in 1986, and Rebecca Commercial Casting in New York City. in 1988 The 'after one was opened as o talenf and casting agency for performers, offering services such as voice-overs television, and cinema advertising work. again. successfully carving out a niche by which to make his mark and ochreve bold commercial per'ormance results.

Al:hough Mr. Brunet later sold his rights to Next Management 'o Faith Kates in 1989, who partnered with Joel Witkenfeld a couple of years later: NEXT represents some of the most prestigious women and men in the fashion world today, Star talent includes renowned fashion models Molly Sims, Daniela Pestova, Audrey Ouock. Yamilo Diaz. and Malgosio 8ela. NEXT continues to maintain an influential international force in the fashion and modeling industry through its fully operational offices in New York. Los Angeles. Miami Sao Paolo, Montreal, London, ona Pans. as well os its affiliates in Milan and Australia.

Because of strong revenue growth and successful business performance, as a result of his artistic vision as an artistic director and talent coordinator. Mr. Brunel founded the very successful Karin Mode's of Amenca in New York City and Karin Models USA in Miami Beach. Mr. Brunel's commercial ventures in opening Karin agencies in Paris. New York, and Miami have been extremely successful generating combined annual revenues of twenty five (25) million dollars- Eventually. Mr. Brunet licensed the Karin name to agencies in Israel, Denrnark. Germany. and Sport. Mr. Brunei •s extraordinary tolenfs are not only limited to launching successful modeling businesses, bul also in discovering and launching the careers of some ot 'he world's nnost successful models. Mr. Brunei has launched the extremely successful careers of supermodejs such as Christy Turlington. Rachel Hunter. Sharon Stone, Monica Bellucci, Estella Warren. and Chnstina Semonnovskaya. These women all oroceeded to become some ot the

rnost photographed international cover rnodels in the word, appearing on thousands of magazine covers worldwide and spanning many years. As a result of his reputation as a highly visible. strategc networker who cuitivates and conducts business in a global ervironmert and brokers iucratlve aeols. many top players in the fashion and entertainment field requested 'hat Mr. Btunel function as their exclusive agent and representative. Some of these top former and present professional supermodels in the fashion field include. Naomi Campbell. Christy Turlington. Rebecca Romijn. Milla Jovanovich, Inez Sasfre. Melanie Thierry, and Jerry Hall. Attached as EXHIBIT 2, please find press arficles regarding the models and actresses who were both discovered by and careers were launched by the beneficiary, Jean It-jc Brunei, Additionally. attached as EXHIBIT 3, pieose find several articles regording the prestigious reputation of Karin Models as formerly one of the worlds leading agencies.

Mosi recently in October 2005 and aftet his rogn with Karin Models. Mr. Brunet launched the prestigvous MC2 Model Management worldwide with offices in New York. Miami and lei Aviv, Mrs Brunei started ihe high-profile MC 2 Model Management in 0!der to represent high fashion models in a boutique agency setting, MC2 Modet Management is already being lauded by fashion insiders as •tone of the hottest agencies in North America" os wetl as "prominently positioned to be one of the major players Of the Zeros because of its insider relationships with 'he most influential photographers around." We invite you to visit www.rnc2mrn.com in order to view the high-caliber of models. MC2 represer ts. Some of its most recent successful bookings include Liu Dan's exclusive controct as the face of the Fall 2007 Guess Campaign and Sammy Jo•s cover story for Cosmopolitan Magazine. Attached as EXHIBIT 4, please find a list of all ot MC-Ts clients, including several high-profi!e campaigns featuring some of MC2s fashion mode's. as welt as several press clippings regarding this prestigious and reputable modeling agency.

Jean Luc Brunet's entrepreneut;al spirit is not only contained to the field of arise beauty. and fashion. In '9700 os a result of his business gnsight, Mr. Brunei founded and grew Jean Luc: Relations Publique. which specialized in press and proc-notions for tour operators and restaurants in France, During his work through Jean Luc Relations Publ,que. Mr. Brunel represented various key clients and collaborated on numerous prestigious events. Some of the prestigious events include. Ait Tour and Daro Voyages. Jean Luc Relations Publique also promoted and marketed la Tour Agent. a three-star restaurant owned by Claude Terraii and, "The Go-between". a motion picture by George Losey. Other projects taken on by Mr. Brunel through his public relations company was his work as pmduct agenf tor lean Claude Killy, 1968 Winter Oiymptc Gold Medalist skier, to promote Vail Colorado in France for tourism potential and Olso directed alt of the promotion for Finland i s Ministry of Tourism. In 1975, Mr. Brunel further inves'ed in 'he Food and Hospitality market by creating ona developing "El Mono Desnuao"- a legendary, high-end bar on the Iberian Peninsu'a. This bar was known throughout the peninsula as extte'nely exclusive and attracted a celetyity

clientele tha: inchJded actress, Ursula Andress. and the Duchess D'Alba. Attached as EXHIBIT S, please find the beneficiary's. Jean Luc Brunei impressive curriculum vitae. verifying his tremendous accomplishments in both the fashion and moceling Industries.

ll. ELIGIBILITY EOR CLASSIFICATION AS AN ALIEN OF EXTRAORDINARY ABILITY IN THE ARTS

Under the wscellaneous arid Technical Immigration and Nationality Amendments of 1991. petitions for classification os an Alien of Extraordinary Ability in the Arts must be supported by evidence of "distinction". According to 8 CFR §214.2(o)(3)(ii). "distinction" means a high level of achievement in the field of arts as evidenced by a degree of Skill and recognition substantially above that ordinarily encountered to the extent that a person described as prominent is renowned. leading, or well-known in the fields of arts. This evidence may consist of proof that the alier musl be recognized os being prominent in his field of endeavor as demonstrated by the fol!owing acco{ding to 8 CFR §214.2(o)(3)(iv):

A. Evidence that the alien has been nominated for or has been the recipient of significant national or international awards or prizes in the particular field such as an Academy Award. an Emmy, a Grammy, or a Director's Guild Award, or

B. At least three of the following forms of doc umentation:

(i) Evidence that the clien has performed. and will perform, services as a lead or starring participant in productions Of events. which hove a distinguished reputation as evidenced by critical reviews, advertisements, publicity releases, publications contracts, or endorsements:

(2) Evidence that the alien has achieved national or international recognition for achievements evidenced by critical reviews or other published materials by or about the individual in major newspapers, trade journals, magazines, or other publications;

(3) Evidence that the alien has performed. and will perform, in a lead, starring, or critical role for organizations and establishments that have a distinguished reputation evidenced by articles in newspapers, trade journals, publications. or testimonials:

(4) Evidence that the alien has a record of major commercial or critically acclaimed successes as evidenced by such Indicators as title. rating, standing in the field, box office receipts, motion picture or

television ratings. and other occupational achievements reported In trade journals. major newspapers, or other publications:

(5) Evidence that the alien has received significant recognition for achievements from organizations. critics, government agencies, or other recognized experts in the field in which the alien is engaged. Such testimonials must be in c form. which clearly indicates the author's authority, expertise. and knowledge of the alien's achievements; or

(6) Evidence that the alien hes either commanded a high salary or will command a high salary or other substantial remuneration for services in relation to others in the field, as evidenced by contracts or other reliable evidence; or

C. If the criteria in paragraph (o)(3)(iv) of this section do not readiy apply to the beneficiary's occupation, the petitioner may submit comparable evidence in order to establish the beneficiary's eligibility.

EVIPENCE THAT THE BENEFICIARY MEETS AT LEAST THREE THE PRONGS OF THE CRITERIA UNDER SUBSECTION B

The **first prong** that the beneficiary satisfies is **8 CFR §214.2(o)(3)(iv)(B)(1)**. which requires evidence that the alien has performed, and will perform, services as a lead or starring participant in productions or events which have a distinguished reputation as evidenced by critical reviews. advertisements, publicity releases, publication contracts, or endorsements.

As a result of Mr. Brunel's combined expertise in fashion and tourism, he decided fo create Latin Model Pageants, now known as Models New Generation- to cross promote i.hese key industries with international business and investment opportunities. MT, Brunel has promoted and judged various modeling contests throughout South America including modeling contests staged in countries such as Peru, Ecuador. Brazil, Argentina, and Chile. Conceived in 1987, the Latin Model of the World event was a high-end modeling and entertainment proauct that appeaied 10 upscale internaf•ona! audiences. reaching nearly 400milhon television viewers worldwide. Throughout rus history as a major internationa l event promoter and artistic and talent coordinator, MI. Brunet has orchestrated multi-faceted public relations, advertising and media campogns that incorpora•ed television, magazines. programs. newsletters, and promotions, becoming notably lucrative fot various major brands os o promotional fool. Mr. Brunei's acute knowledge of marketing and promoting skills has turned his various internaticr•to• events into highly successful artistic and business ventures for various moicy brands Latin Model Pageants attracted

major brands as sponsors, such as American Airlines, Roy-Ban. Coca-Cola, Proctor Gonible, and Revlon.

Mr. Brunei's has continuea his ventures as both a promoter and panel judge when he founded and created the International modeling contest, Models New Generation that took place in Guayaquil, Ecuador in Mr. Brunei sat on a parlel with three other professionals in the fashion industry and judged over forty-nine young women from over North and South America. ASIO, and Europe. Aftet fen days of harsh competition. Jean Luc Brunet crowned the winner, Alyne Weber. a fifteen year oid from Brazil. whorn os o result of coming in first place was awarded over three hundred thousand dollars worth of modeling contracts. The city of Guayaquil. Ecuador was Olso thrown into the international spotligh' as the host city tor the modeling contest. The Models New Generation was broadcasted on numerous television network channels including, Fashion TV, which transmits to over 202 countries throughout the gobe, the entire Association of Television Channels in Ecuador. National Television of China. and Rede Glcbo. Brazil's largest and most popular television network. Attached as EXHIBIT 6. please find several articles regarding the 2004 Models New Generation Contesf as well as the beneficiary's leading role within this prest,gioos modeling ovent.

As a result of the fretnemdous success of the first Models New Generation that took place in Guayaquil, Ecuador in 2004, Mr. Brunei organized the second Model New Generation Contest which was held in 2006 in the Ecuadorian capital ot Quito. In order tc select only the very best new models. several prelimnary. qualifying snows were held tn different countries of Latin America including Bolivia, Panama and Peru. The final contesf was held in Quito, Ecuador at the historical Plaza San Francisco. Mr Brunet sat on o panel with three other pmfessionals in the fashion industry and judged over forty-eight young women from twenty-eght different countries from North and South America, ASIO, and Europe. After ten days of harsh competition, Jean Luc Brunei crowned the winrer, Ginta Lapina. ar eighteen year-old, trom Latvia. whom as a result of coming in first place was awarded over three hundrea thousand dollars worth of modeling contracts.

The city ot Qu;to, Ecuador was also thrown into lhe in'ernational spotlight as the host city for the modeling contest. Agon, just like the immense media exposure given to the first Modeis New Generation competition of 2004. the 2006 Mode's New Generation compe%tion was broadcast on numerous television network channels ircluding. Fashion TV, wh ch transmits to over 202 different countries throughout the globe. the entire Association of Television Channels in Ecuador Nat:onal Television of China. and Rede Gtobo. Brazil's largest and m:osf poplJlar teevision network. Attached as EXHIBIT 7. please find several pʳess articles regarding fhe gxestigious 2006 Models New Generation Competition. as well as the beneficiary's Jean Luc Brunet. leading role within the event. The 2006 Models New Generation program was broadcast tr. over 202

countries throughout the world. Mr. Brunei has pertormed and will most definitely continue to perform services as a leading participant in modeling events, which have a distinguished reputation and bring more public international light fo MC2 Mode's,

For the above-mentioned reasons, M! , Brunei satisfies INA €214.2(0} (3)(iv)(B)(1

The second §214.2(o)(3)(iv)(B)(2) preng that the beneficiary satisfies is which requires evidence that the alien has achieved national or international recognition for achievements evidenced by critical reviews oc other published materials by or about the individual in major newspapers, trade journals, magazines, or other publications.

Mr. Brunei holds an Internationa; reputation as a visible. sftafegic networker who is oble to cultivate expert relationship management skills in ocder to conduct business in o global environment and broke' lucrative deals. Mr. Brunei has o long history in marketing and advertising major fashion campaigns. Throughout 'wenty-five year career the fashion business, Mr. Brunel hos developea worldwide. exclusive modeling and cosmet'C cornpoigns. Some of these major cosmetic campaigns include: Bio Therm with supermodel Eile McPherson. PHAS With Rebecca Romijn, Christian Dior with Christina Semonnovskaya, Morgret Astor with Montca Bellucct. Chanel with Patricia Von Rickenheim, Angel Perfume with Thierry Mugler. ond Cachate; Perfume with Alda Bal!estta Mr. Brunel has Olso developed mapr fashion campaigns and has developed campaigns and exclusive contracts with sorne of the world's top fashion designe€s such as Yves Saint Laurent, Chanel Christian Dior. Gucci. Prado. and Matc Jacobs, Please see the enclosed letter of Claudio Midolo. Presiden' of Modelworke a renowned modeling agency, EXHIBIT 8.

As a talent coordinator Mr Brunei's success con and shcuid also be measured with the successful careers the models, whose careers he launched. have achieved. As stated above. Ml Brunei has discovered and represented various super mode;s throughou* his career. Christy Turlington, who was discovered by Mt. Brunei. has personified unaffected beauty- repcesenting Colvin Klein's fragrances since 1987. Tudington, as well as another rnodei represen'ed by Mr Brunei, Naomi Campbell. becurne one of the few superrnodels. who managed make an easy trans;tion from the haute glamour of the 1980's to the relaxed simplicity ot the toliawing decade. Throughout her extensive career. and as 0 result c! M'. Brunei's "Fashion- Sovvy Eye". Christy Turiingturu has graced the covet 01 hundreds of fashion rnagazines. such as Cosmopolitan, Vogue, Shape. Fitness, Elle. Bazaar. MI-Nie Claire, Harper's.

Esquire, and even Time Magazine. Please see the enclosed letter of Allo Amantovo. Director 04 Figaro International Management. EXHIBIT 9.

In addition, the modeling events that Mr. Blunel has been organizing throughout the years receive not only national, buf also internationa ottention and appear in multiple publications around the world. One of the most recent events he organized, the Models New Generation contest which took place in Ecuador was publicized and transmitted by vanous television networks and appeared on mul%ple newspapers and magazines. among them Globo Television Networks in Brazil, Fashion TV which is broadcast into 202 counfrres throughout the wodd. EJ Universo. Cosas, La Razor), El Diario. Ef Jelegrafo. Not;norie. Extra. Hoy. EJ Gron Guayaquil Et Comercio. Semona. and 8 lideres. to name a few. These major publications have a large subscription rate which numbers In the many millions of readers. Attached as EXHIBIT 10. please find several oress articles reflecting the prestige and high circulation rates of the above-mentioned magazines and periodicals which have featured and covered the modeling events in which the beneficiary. Jean Luc: Brunei. has organized throughout the years.

Hence the beneficiary satisfies INA 5214.210) (3) (iv) (2) for having achieved not only national but also international recognition for achievements in the modeling industry. by having his work publishea iri rnaior newspapers and magazines throughout the world.

Th e thics[A9ng that the beneficiary satisfies is CFR §214.2(o)(3)(iv)(B)(4). which requires evidence that the alien has a record of major commercial or critically acclaimed successes as evidenced by such indicators as title, rating, standing in the field, box office receipts, motion picture or television ratings, and other occupational achievements reported in trade journals, major newspapers. or other publications.

One of the main reasons that Mr. Brunet hos been able to not only survive, but also be extrernely successful in the ever-changing wond of fashion is his ability to identify and recruit star-quality talent. As a resuif of his ability to scout major talents, Mr. B r unei was invited to become o member in one of the fashion industry's most elite and important associations. the International Model T alent Association (here;nafter IMTA). the 'MIA is an international association of training centers for rnodets and taienj. IMTA gves aspiring models, actors, singers. and dancers spectacular oppot!unities to showcase tneir potential talents in front ot top fashion and talent agents from fhe mapr markets of the international fashion industry, IMTA also provides its association members valuable marketing tips ard networking events with agents and scouts from around the world. Severai of todavs up and coming actors and models have been discovered at IMTA: sorne of these discoveries include world-renowned actors such as, Elijah Woods, Ashton Kutcher. Katie Holmes, Eva Longor•a. Jesstca Biel. and Sean William Scott. Attached as EXHIBIT 11, please find information regarding tne extremely successful and prestigious modeling and fashion association. IMIA. Additionally. please find several pages from iMTA's official

website documenting their discovery of the above-mentioned A-list actors and actresses, whose membership in IMTA proved to be the launching pad fot very successful and htghly profitable careers in the film industry.

Furthermore. as previously mentioned. Mr- Brunei has launched 'he successful careers of many internatonally renowned models. who have been featured and still are In mony international ana notional fashion magazines. In addition. his commercial ventures, especially MC2 Models, focmerly Karin Models, have been extremely successful generating combined annual revenues of twenty five (25) million dollars. Currently MC2 one of the most successfu; and well-known modeling agencies in the world. Mr. Brunet is one of few people in the modeling business that have achieved a similar standing and have been abfe to maintain if for over twenty-five years.

For the above-mentioned reasons. Mr. Brunel satisfies INA214.2(o)(3)(iv)(B)(4).

				THAT THE BENEFICIARY	8 CFR

The petitioner has subrnitted a plethora of evidence regarding Mr. Brune!'s experience In the fashion modeling industry. Mr. Brunel's has established MC2 Models. formerly Karin Models, which is p!esently one of the major international modeling agencies, with combined annuoi revenues of twenty tjve million dollars. Only someone with Mr, Brunei's expertise and strong strive f0' success can achieve such international occlomotiotl in 'he industry and been abie to main'cin his status for over twenty-five years. Mr. Brunei is the one responsible tor the launch of numerous supermodels' careers. which have been ma:ntainea in the spotlight for several years, He has worked with renowned fashion designers and photographers. who have trusted his work ond intuition. in addition, Mr. Brunet has orchestrated many intetnotjona; and national successful fashion events that have received inte' national acclamation.

For the coove-men•ioned reasons, Mr. Brunei in additi0"l to rneeting at least three of the criteria of 8 CFR §214.2(O)(3)(iv)(B). he also qualifies under 8 CFR 5214.2(O)(3)

"I. CONCVUSION

It clear from the evidence that Mr. Brunet is eligiö*e tor classification as an Alen of Extraordinary Ability in Art Direclion and Talent Coordination based upon his meeting the eligibility requirements under the Imrnigration and Naturalization Act 101 a)(15)(O)(i) and 8 CFR 214.2(0). Mr. Brunet's successful career proves that he is o prominent, leading, and wel-known person in the field of atts. Mr. Brunet's extraordinary ability in the field of orts. in which he wil continue to work in the United States, has been demonstrated by sustained national and international acclaim. Based on the foregoing. we respectfully request your kind consideration and favorable determination of this petition. in

order to accord Mr. Brunel the classification as an Alien of Extraordinary Ability in Art Direction and Talent Coordination. Again. kindly note that the beneficiary, Mr. Jean LUC Brunel, has held O- status in the past,

Wherefore, for the above-stated reasons. we respectfully request your favorable adjudication of the 0-1 nonimmigrant visa petition submitted by MC2 Models Miami, LLC on behalf ot Mr. Brune/. If you should have any questions or requite any additional documentation, please do not hesitate to contact our office.

Thank you very much for your kind attention regarding this matter.

Truly Yours,

Milan. September 1-0% 2014

USC) s
Vermont Center
75 Welcien Str•eeq
St. Albans, VT 054'9-0001

RE: 0-1 Non-immigrant Vtsa Petition on behalf of Jean Luc tidier Henri-Rene Brunei

I write this letter in strong of Mr Jean Luc Brut:ers application tor a non-immigrant visa to this country. am currently Ajnministratore Unico in Studio Fp, hd&t• been asked to review the professional credentials of Brunei. and it is my professional opinion that Ms. Brunei is an Art Director and Talent Coordinator of extraordinary ability who ranks among the percentage of foreign pcoptc at very top Of his field.

I seen first-hand Mr Jean special expertise in the field. including casting, production. coordination. and art directinn for shoots. Mr. Brunel is considered by those in out industry to be an extracgdinary creatio.e director talent. particularly for the fashion and industries. In my dealings with Mr. Jean Loc Brunet, found him to be thoroughly professional and capabk of tying utilized in connection with a nide range 01 creative subject matter on any assignment. He has the intuitive ability to provide just what*s needed in connection any particular creative procyss and possesses excellent artistic rnanax•enxnt and operational skills that come fmm his years of experience.

Many peopie do not understand that behind every successful udvMi*ing campaign and faqhion shoot ther are tnen and women who are making sure that the business operates efficiently by emrdinating different tasks between models, photographers. and managing teams. I can honestly say that Mr. Brunei continual!'" proves himself as an extraordinary in hig field.

IOffer an unmitigated endorsement for Mr. Jean Luc Brunei regarding his visa application as a person of extraordinary ability. re is no doubt in my mind that his popularity and ability in the field wi oniy continue tn prosper in years to come.

Sincerely,

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9/ 16! 14

USCES czncсr

'S Weaer, Street S..
Albans.

RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam.

I write this letter in strong support of Mr. Jean Luc Brunel's application for a non-immigrant visa to this country. I am currently working as an **Agent** at Two Management in **Los Angeles**. Based upon my standing in the field of the fashion industry I am frequently called to evaluate the credentials of other professionals in the field. I have been asked to review the professional credentials of Mr. Jean Luc Brunel. It is my professional opinion, based upon my personal and professional knowledge of Mr. Brunel's talents, that Mr. Brunel is an art director of extraordinary ability who ranks among the small percentage of foreign professionals at very top of his field.

I greatly admire Jean Luc Brunel and find it a pleasure to work with such a talented person. Judging by the high profile success of the companies with which he regularly works, clearly I am not the only one who appreciates his talent. His models have appeared in any of the world's most popular publications, reaching literally millions of admirers. He is particularly famous for his work in fashion, advertising and editorial world. His contribution to major clients, such as **Calvin Klein, Gucci, Christian Dior** have secured him a position as one of the leading high fashion art directors working today. Jean Luc Brunel is the consummate professional when it comes to the art of fashion and his work is often displayed in world's most elite magazines. A true artist, he is committed to the satisfaction of the client on every occasion. Although Mr. Brunel commands the highest compensation for his work, he is well worth the cost.

Mr. Jean Luc Brunel is unquestionably an individual of extraordinary talent, energy, international achievement and acknowledgment. Should you have any questions regarding Mr. Brunel's extraordinary ability, please feel free to contact me.

Thank you for your attention and consideration.

Sincerely,

Luc Brinker

CRECKADELSTUDIOS

500 Broadway 2nd floor new york 10012 Èzqa 219 9374
info@GREGKADELSTUDIOS.com

September *6.9094

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Vemoat ServiceCenter
75 Wek>a Strc<
St. Albans, VT 05479-0001

RE: CLI Nan-hnamivant Visa oe bt'hHif Ut Jean Brunei

Des Sir o: Madam.

Th" written to m.;pçnrt the of Jean Bt-uxu-{ that may be 0-1 ahilwy stans to upon ulmaày ia the wrIà•Aide fa•hion I am the M•natgt at Greg V•de) with as Namém, Inren:frw. Vovue Germatp, am:l AUurr

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—ch Elk Mr. Brunern

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an 0-1 tn "ark in the ermed States, Mirely his Pherotrnal talent Lo the

Vlease dn not hesitate to contact me with any questions.

Sineere}y.

Ernesto Quiliza

Production Managet

tnontage

USCIS

Vermont Service Center 'S

Welden Strrt•»: gt,

Albanst VT054

RE: O-i Non-tnunig.runt Visa Pelztion 00 t*hali of Jean Luc Brune] Sir or

Madam:

My name nm P:cuient I 30 and am ln al} over murld. A my clrnts include Mapzine, Simons Laura Shop, The 50 or.. Az such, I am qualified to comment Mr. Jenn Brut*l's carecr un art dir«lor of

't oat only because of hig aeclanations or hjs Impresgi%e work that fashion ad%tTtising nnd publishing executiss amand tbc world c.bot»e utilite Mr. Brntzel's talalt theqr renowned acwunt*. Mr. Jean Brunel is also nn nb€o}utQ cxpcrt u! dicnts %'ith exactly the Image of their desire. My appr«ution of Mr. brune' makes it asv for me to comprrhend his nectan-,ntionq. Fram my oadpcint, the ave

«e:-t8tnly Acwrdinglv, Mr Brunel IS ln a to commend sizabie for hiy tmrk as to otheo in the txjsiness

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new concepts to his ability. Over distinguished hi industry.

Mt. Jean tax Brunel er,joys en extraordinary relationship to the aeBthetic. Thisqtnlity manifests itself •.hmugh the Exeutifuì nork ne creates, time anm tinw. Thetrfatr. Jean LAC Brune] is one ot the most lawvrking in wor%d today book forward to seeing nwre of in the future.

professionals his work in th

Sincerely Yours,

Nadia Cenova matnge

NORDSTROM

Septunb•t 1 7, 2014

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RE: 0-1 Non-immigrant Vza Petn•on on batutf of .Ean Luz Brunei

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ghout Mr Jean Luc Brunel's distinguished career, he nas feceewd a highb impreub.se •t of prafaæorW hone-s •rd •ctuogunmtz In eno past tow yen. Mr Brund bewtifL-i mcdels that have in a acclaimed peopcts en some Of mos* erninent which serves •s a testam•re bo DE tients.

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can ʳaetlty that Mt. Luc stab-re He has reo&ted e level wizte Jeen Luc

here hete ne eutni!'9 bet

Sincerely,

Liza Masiow
Senior Talent Producer

Brund's Bilr•otdinaty catær is bi a

Nordstrom

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Nordstrom, Inc.
2001S Michigan St, Seattle, WA 98144
Nordstrom.com

Recommendaunn I.e.tter

22/09/ 14

USCIS

Vermont Service Center 75
Lower Weiden Street st.
Albans, VT 05479-0001

RE 0-1 Non-immigrant Visa Petition on behalf of Jean Luc Brune:

Dear Sir or Madam:

It is an extreme pleasure to wnte a letter of recommendation for Mr. Jean Luc Brunel. i provide this rcommendation based on my knowledge and experience in the field of modeling, due to my established reputation and work in the field as the Vladimir Yudashkim director of I Mother Agency. Kiev> Ukraine

I have known Jean Luc Brume) ptuless.onally several yeom th:ouxh our work together and, my opinion, he is an extrpmeiy ta)eneed individual with superb prufe551ünul reputation. He is an ;exlraordtnanly able coordinator whD strives (or and Ettuins a level of merit in hts workthat only a few of hi8 contemporanes meet. He has the to recognize the creative v:sior, of bas client within the tune and budget through his careful and thoughtful chore of model casung combined with his metaculous ability in the ficld. Jean Luc Brunei 1b a true find In our industry.

t%ere are plenty of art directors out there. but nonc with the depth and quality that Mr- Brunel possesses He is unlike anyone in this industry. and I expect to see him continue to find great modcls m his succcssfui career. Someone overflowing with talent as Jean Luc Brunel ghouid bc given every opportunity to work in the United States, where he will have the proper venues to showcase his extraordinary talents.

Please do not hesitate to contact me hesitate me should you have -any que8tions regarding thig matter. Thank you your time and cÖnsidrration.

Sincerely ,

Vladimir Yudas

fjGQ(O

Number 061714/1
June 17, 2014

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United Stabes and Imm•gration Soretces

30 Houghton Strut
Saint AJb.re8. VT 05478

O-1 Extraordinary Ability as an Art Director and Talent Coordinator on Jean-Luc Didier Henri Bernard Brunel Ad and Coati Jean-Luc BeM-R0M

[illegible] the opportunity to write this letter in support of Mr. Jean-Luc Brunel's petition to work as an Art Director and Talent Coordinator in the United States.

As a talent coordinator, Mr. Brunel's success can and should be measured with the successful careers the models whose careers he launched have achieved. Mr. Brunel has discovered and represented various supermodels throughout his career. Christy Turlington, who was discovered by Mr. Brunel, has personified unaffected beauty representing Calvin Klein's fragrances since 1987. Turlington is well as another models represented by Mr. Brunel, Tatiana Sorokko, is another one of the few supermodels who managed to make an easy transition from the nude position of the 1980's to the relaxed aspects of the following decade. Throughout her extensive career and as a result of Mr. Brunel's fashion savvy, Christy Turlington has graced the cover of hundreds of fashion magazines such as Cosmopolitan, Vogue, Shape, Fitness, Elle, Bazaar, More, Glamour, Harper's Bazaar and even Time Magazine.

Mr. Brunel has also launched the extremely successful careers of supermodels such as Naomi Hunter, Sharon Stone, Monica Bellucci, Estella Warren and Christine Sempmovskaya. These women proceeded to become some of the most sought after international cover models in the world, appearing in thousands of magazine covers worldwide and spanning many years. As a result of his reputation as a highly skilled and straight talk worker who promotes and conducts business in a good environment and treats opposite sex, that is very lovely in the fashion and entertainment field, requested that Mr. Brunel function as their exclusive agent and representative.

[illegible] more than satisfying experience working with Mr. Jean-Luc Brunel coordinating a gala list of events and the opportunity for him to find too new talents to represent in the United States through our agency.

Please do not hesitate to contact me for any more or any questions.

Sincerely,

Alla Amantova
Director

MODELWERK

MODELAGENTUR GmbH
[illegible]
[illegible]
www.modelwerk.de

Hambug 8 July, 20 h 4

Department a! Homolond Security
United States Citizenship and Immigra•ian Service:
Vermont Service Centee
30 Foughton 9reet
Sam1 Albans, VT 05478

Ro• 0-1 Extraordinary as on Ar e Dircc'o r and Talort Cocrdinata onbehdf of -lean-Luc Didier —enn-Rene Ennei

TO Whom ItMay C

As a Ptesidert of McoeWerk. this letter is submitted in sJDpor• of MC 2 Models Miami. -LC or behalf of Mr Jean Luc Brunei to wo r t as ar Art Director and Talent Coydtnatcz.

MT, brunel ' tolcls at' it'tccnatior•al rcg-"atior os o v.fiiblo sPo'f.'9ic netwo«ot who able •o cultivate oxoe•t relationsh management sk its order to conduct busness In a globat er vror,meq• ood bcc«er lucro•ive deals. Mr. Brunel nas c long ntstccy mark-etag and ad'+er1Eng rrovor fashion campaigns, Througho-'t nts frnentv-tive year career the tosr-t,cn business. Mr- Brune bas develooad wore-wide. excusive odelirtg and cosmetic campogns. Some of major cosmetic compogns incluxdc BIO Them wffh superrnodel tile Mi.-. P hersa r„ PHAS Rebecca Rome:n. Christian Dior Myxet Astor with Monico

ellucci.Chanel With F.".--terlbteirn,. Arge Perforne w th Th erry Mvøet. ond Coct'.are ACC* Bullestra. Mr. 3,-ur.e has Olso deveöoped maloc fashion ccrnouorts ono has ceveor»ed camoaigrs ard exclusive CO%'fOCfs v,'th of the world's top fashion designers such as

Yves Saint Laurent, Chanel, Christian Dior, Gucci, Prada, and Marc Jacobs.

In addition to Mr. Jean Luc Brunel's extensive business qualifications, his career as an individual with artistic vision and creative talents has helped him find top fashion models to represent in the United States.

Should you have any questions about Mr. Jean Luc Brunel qualifications, feel free to contact me.

Sincerely,

Claudia Midolo
President
Modelwerk Modelagentur GmbH

Natalie
MODELO AGENTURA

MOOt

July 8, 2014

Depcrtment 04 h6maar»d Security
United Stole CbQenstip ond Immigration Services
Verm»ont Seybce Concer
Houghton Street
St Albans, VT 05478
Sdnt Abc.ns 30

Re: CM Abey OtecÜ ano Tasent Co«ønatcx on Deholt of Jeonauc thief &une/

10 Whom May Concern:

As o President o' Notate Mooe Monogerr•nt. lhes letter is submitted in supocet of YC2 Models LLC bet'0tf 0? Mr. Jean Luc BMW pc: won: os on Ad Director and Coatinctry

Brune as o

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ad you have any que tree to contact me.

Sinceeety.

hoye ony quesSons atxwt Mr

LLC Yunei

EN Meiscrts

Vermont Service Center
Attn: Premium Processing unit 30 Houghton Street
St. Albans, Vermont 05478-2399

U.S. Citizenship and Immigration Services

Facsimile Transmission

Fax Number: 19542414272

LUIS FONT

Number of pages including cover:

Date: September 5, 2014

From: Vermont Senqce Center — Premium Processing unit Fax Number 802-2881778

Email: vsc.P8EM'UM PROCES$NG@DHS.GOV

Phone: 1-866-315-5718

Receipt Number:

Attached you wili find a copy of our decison concerning your case

The original decision witl follow va mail 'f ehgiOEe to appeat our decision appeal forms WII* be included

ImportantImportant***Important***Important***

If responding to a Request for Evidence or \ntent to Deny, ensure you include a copy of the decision immed:atey following your cover page and indicate the total number of pages included with your response Please include the case receipt number (e g EACOI 000 12345) with a] correspondence

Ensure when responding to trys request that you fax your response to our NEW FAX NUMBER - 802-288-1778.

f you Wish to mall a response, It must be sent to the VSC Premurn Processing Unit at 3D Houghton Street St Albans, VT 0347&2399 Do not send your response to the 75 Lower Weiden Street address, as that will cause de'ays and wilt not restart the premium processing c\cck until the response identified as a premium processing case

Title 8 CFR Section 103 Submsson of evidence in rsponse to a Semce request states.

AE evidence submitted in response to a Service request must be submtted at one time. The submission of on\y some of the requested evidence te considered a request for a decjsicn based on the record.

Th'S communication as intended for the sole use ot the to whom it addressed and may contain information that is privileged. confidentia; and exempt from dsclosure undet applicable law if the of this commumcation is not the rttended recipent or the empioyee or agent for delivering the commumcabon to the Intended recviert. you are hereby notfied that any dissemination. dstnbution cr copying of th1S communication may be strictty prohbited If you recewed this commumcation tn error. please notify the sender im.medtatet•y by telephone and return the communication at this addtess above via United Slates Postal Service. Thank you.

Applicant/Petitioner A #	Application/Petition Petition For A Nonimmigrant Worker (form I129)
Notice Date August 26, 2014	Response due by November 21, 2014

MC2 MODELS MIAMI LLC
LUIS FONT
FONT LAW GROUP PA
3440 HOLLYWOOD BLVD STE 415
HOLLYWOOD FL 33021

EAC1422550803
EAC1422550803

Applicant/Petitioner MC2 MODELS MIAMI LLC
Beneficiary BRUNEL JEAN LUC
Receipt Number EAC1422550803(I129)

PREMIUM PROCESSING

MC2MODELS MIAMI LLC
'Lilts FONT

FONTLAW GROUP PA

3440 EOLI\WOOD STE415
33021

IMPORTANT: THIS NOTICE CONTAINS YOUR UNIQUE NUMBER AND MUST BE SUBMÜTEI) IN THEORIGINAL WITH THE REQUESTED EVIDENCE.

l. U.S. Citizenship and Immigration Services (USCIS) requires additional evidence to process your fonn. Please provide the evidence listed on the attached page(s) For Form 1-129 only, ifyou are requesting consulate/embassy notltication, provide the requested evidence In duphcate.

2. Your response must be received this offjee on or before November Please notc the required deadlme tör prcvldmg a response to this Request for Evidence. The deadline reflects the maximum period for respondmg 'o thus RFE.

However,stnce many Immigration benefits are time sensitive, you are encouraged to respond to this request as early as possible but no later than the date provided on the request. You will not be granted an extenston of Ome to submit the requested evidence.

U S Homeland Security of Action and Immigration 4

Y You must submit all requested evxience at the same tune. Ifyou submit onlysome ofthe requested evidence, USCIS will consider it a request for a decmon on the record (8 CFR103.2(b)(

4. You will be notified separately about any other applications or petitions you have filed.

S From the date thus office receives your resubmission, a mimmum of 14 day will be requu•ed to process your form It'you have not heard from VSCIS within 30 days, you may contact this office at (866) 315-5718.

6. Mai] thLS notice and your response to.

VSC Premium Processing
Vermont Service Center
30 Houghton Street st Albans. VT 05478 z399 vsc-nremutQ processing@dhs.gov

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U _S. Citizen±hip Servit.o Page 2 at

Responses (tor Premium Processing cases oniy) may be taxed to (80?) 188- 1 778. Include a copy ot Ih:s not:ce. address may only be used for mquivies. Do not send responses to the address

1-129 Q- I B Extraordftiary Abihty the Arts

Ycu. MCZ Models Miamr LLC. filed Form Petitiûll Ier Noriirnrnigrant Worker seekirzg 0-1 B classification Luc Brunel as an An / Talent Coordinatcr.

The O- IH classification applies to individuels Witti extraordi,nary ahility the arts. The individual must have sustëil',ed national or international ecclaim. His her achievemer,ls must be in the field cf expertise ZLd sh(.nv a record of promir:ence in his or her field

Ic process your and determine it ber;etici31Y is eligible additional informatior, is required, This request provides suggested eviderxe that you may sub:nit to sausty each requested item Yeti may

Submit cr ail cf these items

Submit ncne of the suggeste(i items and insteed ct her evjdence satisfry the request.

Explajn how the evjdence in the record 31ready . Request eligil)illty.

a based on it',e record.

Note, however, that you are tes nsible ter revi(itn evidence best shows cu and the arties to this petition meet all requirements. E Evidence must show thal all parties were fiigible the requested berefit whet: you filed Form I-129.

General Requ:rements tor All O Nonnn/liigrant Petitions

In genera!. petiticns seeking O ncnimmjgrent dassltica!ict) must jrxlude•

Copies of contracts:

- A description the cornpetltwn(s) evem(s) . or pertcrmance(s) . ana
- At least one corxa!tatinn.

lb satisty (hese requirements. ycu subrnitted:

- Your letter support the petiti011,and

Peer in suppe,'l benefinary frorn Claudia ar:d Aila Arnar,tcva

ficiary'sFrevious () Status

Petitions involvir,g ail extension status a benetitlary has previousiy been grar.ted

O-1 nonimmigrant StatUS may he given fletêrerce: however. U Citizenship and Immigration (CSCIS) is authorized TO question extension petitiors a substantial change in circumstar,ces occurs. when relevant tàcts change

one petitiû!ı toother. orwhen prior epproval may have been based CSCIS errer.

You indicate the beneïiciary was previcus\y granted 0-1 status With your The details of theberriicial.y's prev\cus employ:n€nt wilh are not documer,ted in the instant petitiorv A review ot the evidenee su bmitted I!lditates if the heneficiûty's role Wilhir, your crganizNior, has unchanged. the prevtcus petjti011 rnay have been approved in encr es the (luties provided Cic not appear to describc a

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Doparmwnt of Notice

U.S. Citizenship Services Pago 3 ot

position in the arts.

In addition. no evidence has been submitted to support your clairn that the beneficiaty is an individual who has extraotdinary ability in the arts that has been demonstrated by sustained national or iraernaticnal acclairn You have documented the beneficiary s past success in the business ot forming and operation modeling agencies. but This evidence points the beneficiary's ability on the

field of business, not the arts. Theretore. you are asked comply with the tdllowtng:

Contracts

Peotions seeking O nonimmigrant classjtication must include a copy of a contract between the beneficiary and ei%her the petitioner or the employer. If a written contract does not exist. you may submit a detailed summary of the terms of the oral agreement between the beneficiary and either the petitioner 0T the employer.

You did not submit any evidence tor this requtrement. You may still submit evidence to satisfy it.

Written contyacts. or the summary of the terms of an oral agreement. must specily the terms and conditions of the emplcyment or services. They must:

Specity the wage offered and explain the teyms and conditions ur;dey which the beneficiary WIII pertCrrn these services: and

- Detail any additional services provided.

Nature of the Event or Engagement

You must provide an explanation the competition. event. or performance in which the beneficiary will participate, An event means an activity such as a scientific project, conterer,ce, convenficn. lecture series. academic year. or engagement during

requested validity penod.

The description you submitted is insufficient. In your latter you list the dulies of the proffered position as:

Responsible overseeing the artistic aspects cf agency (sejecl the images placed on the models' busmess cards

and in their portfolios).

Coordinate the pairing of models with ph0\ographcrs:

Direct the marketing of models to clients,

Travel around 'he world discover new talent and Sign them With MCZ Models: and

Establish relationshjps with agencies around the world and negotiate representation agreements.

The duties you describe appear to relate exclusively to the maintenance of business operations oi a modeling agency. As previously stated, you have documented the beneficiary's past success in tOrnung and operating modeling agencies: however. this evidence

points to the beneficiary's ability in the field cf busmess. not the ms. It is not evident, lheretcre that the O- 1B nonirnrnig:anl classification is appropriate in the instant case.

Regulations define lhe "arts" as any field cf creative activity or endeavor such as. but not limited to. tine arts visua\ arts, culinary ans. and penornUng ans. Ahens engaged in the field of arts include not only the principal creators and performers but other essenlial persons such as, but not iimited to. directors, seg designers, lighting designers. sound designers, choreographers. choreologists. conductors. orchestratere coaches. arrangers, musical supen'iscrs, costume

FOR OFFICE USE ONLY

EAC1422550803 (I129)

designers, makeup artists, flight masters, stage technicians, and animal trainers.

The duties you describe correspond to business and management functions; not to a position in the arts. Before adjudication of your petition can proceed, this discrepancy must be resolved.

You may still submit evidence to satisfy this requirement.

The description must include:

- An explanation of the nature of the events or activities;
- Beginning and ending dates of the events or activities; and
- A copy of any itinerary that shows dates, name(s) of the employer(s) and location of the event(s).

You must establish that the proffered position qualifies as a position in the arts as described above. Any and all claims must be fully supported by documentary evidence.

FOR OFFICE USE ONLY

FONT LAW GROUP, P.A.
3440 Hollywood Boulevard, Suite 415
Hollywood, FL 33021
Tel.: (954) 241-4271 Fax: (954) 241-4272

November 3, 2014

Director
United States Citizenship& Immigration Services
Vermont Service Center
75 Lower Welden Street
Saint Albans, VT 05479

RE: NOTIFICATION OF WITHDRAWAL OF 1-129 PETITION
WITHOUT PREJUDICE BY PETITIONER
EAC-14-225-50803
Petitioner: MC2 MODELS MIAMI LLC
Beneficiary: JEAN LUC DIDIER IIENRI RENE BRUNEL

Dear Sir/Madam:

Please be advised that this office represents the above referenced petitioner and beneficiary in this immigration matter and a G-28 from our office is on file.

THE PETITIONER, MC2 MODELS MIAMI LLC HEREBY NOTIFIES USCIS THAT IT WISHES TO WITHDRAW 1-129 0-1 PETITION #EAC-14-225-50803. The petitioner requests withdrawal Of this 1-129 petition without prejudice. Please note this request tor the record in the above referenced case.

We respectfully request that you send us verification of this withdrawal pursuant to the regulations contained in 8 C.F.R. Sec. 103.2 (b) (15).

Kindly send our office a written verification of this withdrawal located at:

Font Law Group, P.A. 3440
Hollywood Boulevard, Suite 415
Hollywood, FL 33021

Thank you for your attention to this matter.

Sincerely,

Luis Font, Esq.
Attorney-of-Record

— Original message — From: Jeff Fuller
Date:l l/12/2014 11:49 (GMT-05:OO)
To: Jean Luc Brunel
Subject: RE: New York

Jean Luc,

I am really sorry you feel so bad and I know it has been a mental and psychological frustration. As you know I chose to partner with you due to your reputation in the business for being a top scout and developing a couple world class agencies in the past. I knew what you could bring and I knew what I could bring and contribute and I thought it would be a great partnership. Clearly, I never expected to have the level of challenges we have had recruiting new models over the last several years. I could have

never foreseen the problem of your friendship with Jeffrey Epstein turning into the situation it has where you are seen as guilty by association when you have never done anything or even been convicted of a crime. Frankly, I don't understand the necessity for Conchita Sarnoff or anyone else to continue to defame your name and MC2 by association.

It is true that we constantly have to justify ourselves when recruiting new models. The industry is extremely competitive and as a parent myself if faced by the same information and having to make a tough decision between too agencies I would not pick MC2 if I saw the article online about you. You have to read closely to see there is not a charge against you but the implication is strong and of course now days everyone believes everything they read online even more than the traditional newspapers of the past.

I know you are now feeling like a liability to MC2. But you personally are not a liability to MC2 but this published information online is a liability. We are not a large enough company, nor do we have the capacity to fight this on a global level. On a google search in America we have put enough information online to not have it popping up so blatantly but we have no controls over the rest of the world or the finances to control this situation and we are affected as every major model agency recruits it's best models from all the various countries abroad. This has stunted our growth and our billing over the past 6 or 7 years. In fact, we do not even know who avoids us based on finding this information. I have been surprised how challenging it is for us to grow due to this problem.

I have also had a tremendous amount of worries from our clients that we are vendors for that are large American corporations likes Kohls, JC Penney, Sears, Nordstrom, Target, Neiman Marcus, Macys, Saks, Belk, and so forth that require vendor agreements and for us to be considered an upstanding company. It really worries me as some of those companies have disassociated themselves from what

K

EXHIBIT

they believe to be questionable companies. So far that has not been a problem but it could come up in the future.

The fact that you are requested for so many scouting events in various countries and cannot promote yourself properly to promote MC2 in the press due this problem has it's own sent of repercussions in terms of our global branding. In short, it has had a terrible effect on MC2 all around. I really urge you to solve this problem and get this removed from the internet so we can grow for the future. I've fought for MC2 and been extremely loyal but I must confess that I have even been feeling inadequate and questioning my ability as the leader of the organization. I can only attribute the fact that we have scraped by in the recession and barely survived in the past to your hard work, my hard work, and the tenacity of both of us combined.

I can only imagine that if I am feeling inadequate and frustrated over a lack of growth of our company that you must feel even worse as you have had much greater success in your career and have operated at much higher standards in our industry in all areas from reputation, respect, admiration and monetary gains. I can even surmise you are probably feeling a level of depression and I have seen it in your highs and lows and when you have voiced your frustration. While I know you well and recognize you don't really go for the kind of advice I will offer; however, I think you should at least speak to someone neutral such as a therapist or a counselor to let your frustrations out and if you don't feel better and are still feeling down or depressed to see a medical doctor for your condition. You are such a positive person I hate to see you fighting what you feel is a hopeless battle. It is not hopeless you just need find a way to get that information offline and begin to repair your reputation. In the end I am afraid the damages are a lot more than you realize but let's keep fighting and moving forward as we have no choice.

Thanks,

Jeff

Jeff Fuller

EXHIBIT K

President

MC2 Model Management USA

FROM: JACQUIE JOHNSON<JJOHNSON@RRA-LAW.COM>
DATE: SEPTEMBER 18, 2009 3:57:44 PM EDT
TO:
CC: "BRADLEY .J. EDWARDS"
SUBJECT: EPSTEIN - DEPO OF JEAN ruUC BRU11NE1u

We have confirmation for Mr. Bruhnel's deposition on 11/3. We will commence at 10:00 a.m. if that is ok with you.

Jacquie Johnson
Legal Assistant to
Brad Edwards, Esq.
Partner
Rothstein Rosenfeldt Adler
401 East Las Oas Blvd.
Suite 1650
Fort Lauderdale, FL 33301
Telephone 954 315 7264
Fax 954 527 8663
Johnson rra-law.com

EXHIBIT L

-----Original Message-----
From: Tama Beth Kudman <tama@tkudmanlaw.com>
Date: Monday, November 16, 2009 at 7:48 PM
To: Jean Luc Brunel <2jeanluc@gmail.com>
Subject: Re: Hi

>AII depos are cancelled for now. A letter confirming this is being
>Sent out today. We have no idea how long this shall delay things. I'll
>let Michael know.

>Sent from my iPhone
>Tama Beth Kudman

EXHIBIT M

From: "Dr. Royce Jalazo" <dynamicbeh@gmail.com>
To: joetitone708@comcast.net
Sent: Tuesday, December 23, 2014 PM
Subject: Jean Luc Brunel

Mr. Titone,

Please accept this email as my formal notification that Mr. Jean Luc Brunel attending an outpatient individual psychotherapy session with me on 12/12/14.

Thank you,

Royce N. Jalazo, Psy.D.
Licensed Psychologist

Dynamic Behavioral Consulting
a DBA of Dr. Royce Jalazo, P.A.
1975 E. Sunrise Blvd., Suite 532
Ft. Lauderdale, FL 33304

Direct (With Voicemail): 954-232-7092
Toll Free Fax: 888-236-6979 or 954-208-3400

E-mail: DynamicBeh@gmail.com
Website: www.DynamicBeh.com

EXHIBIT N

DYNAMIC BEHAVIORAL CONSULTING

Psychotherapy / Evaluations / Consultations

Client Progress / Informational Notation
Dynamic Behavioral Consulting
1975 E. Sunrise Blvd, Suite 532
Ft. Lauderdale, Florida 33304-1413

Client: Jean Luc Brunel
Service: ☒ Individual Session ☐ Family Session
Session #:

Date: 12/12/14 M T W TH FR SA SU
Time: 3:15 a.m. / p.m. 4:05 a.m. / p.m.
Duration: 50 minutes
☒ face-to-face ☐ telephonic

Hyperverbal in his speech, hyper-motor movements, very dramatic, jumps from topic to topic

MOOD (or client reported/observed)

☐ Calm/Euthymic	☐ Cheerful/Happy	☒ Irritable/Angry	☐ brooding
☐ Fearful/Anxious	☐ Depressed/Sad	☐ Tearful	☐ Other
☐ Hopeless	☐ Pessimistic	☐ Neutral	
☐ Other, explain			

AFFECT (check one)

☐ Appropriate	☐ Inappropriate	☐ Labile	☐ Dramatized
☐ Blunted / Restricted	☐ Flat	☐ Slightly Intense	☐ Unknown (telephonic session)

Vacillates between cheerful (making jokes) to irritable statements

SESSION CONTENT:

Mr. Jean Luc Brunel is a 68-year old divorced Parisian-American male who is seeking psychotherapy due to a subjective sense of depression related to what he believes is a loss of business. In this modeling agency as a result of a lawsuit publicly against his business. Mr. Brunel reported that in 2006 a friend was convicted of a sex offense (having sexual relations with an underaged girl) and that after he assisted his friend post jail 3 times, a local journalist began publicly on the internet that his company, MC2 was involved in sex trafficking, an allegation that he vehemently denies. Patient reports depressed mood of 6-7 on scale of 0-10 with 10 representing most severe, presents sleep disturbance but able to maintain sleep with sleep aids.

PSYCHOTROPIC MEDICATION: (circle and check all that apply)

Was patient referred for psychiatric evaluation by undersigned and/or prescribed psychotropic medications by a psychiatrist but is presently non-compliant? ☐ Y ☐ N Comment

Is patient current taking psychotropic medications ☐ Y ☐ N Type / Dosage:

Compliant as prescribed? ☐ N/A ☐ Y ☐ N Comment

MOTIVATION FOR TREATMENT/CHANGE:

☐ Highly motivated ☐ Reasonably motivated ☐ Poorly motivated ☐ Unmotivated

DISPOSITION:

☐ Continue Treatment ☐ Termination of Treatment ☐ Refer to psychiatrist / other provider / Reason
☐ Other:

Personality Disorder, Unspecified
Adjustment Disorder with Depressed and Anxious Moods.

Royce N. Alazo, Psy.D.
Licensed Psychologist #PY7671

EXHIBIT O

COMPOSlT
E

EXHBIT

PMEDICAL

HISTORY

MEDICAL CERTIFICATE

BNH HOSPITAL
โรงพยาบาลบีเอ็นเอช
HOSPITAL SINCE 1898 (Chatham Convent)

แผนกผู้ป่วยนอก / OPD

ใบเสร็จรับเงิน/Receipt

MR. JEAN LUC BRUNET

09-10-010876

02/12/2014 1:27PM

09-RO14256417

02/12/2014

1248

1:58PM

รายการ Description	จำนวนเงิน Amount	ส่วนลด Discount	คงเหลือ Net Amount
Drugs and Parenteral Nutrition [illegible]			
Medication [illegible]	3,480.00	0.00	3,480.00
Packaged Medical Charge [illegible]			
Other Medical Service Charges [illegible]	200.00	0.00	200.00
Physician Evaluation [illegible]			
Physician Evaluation [illegible]	800.00	0.00	800.00
รวมทั้งสิ้น Total	4,480.00	0.00	4,480.00

**Four thousand four hundred eighty Baht Only **

Credit Card 4,480.00 THB Baht

[illegible] they have experienced adverse reaction to that medication

Please keep this receipt for reference

ศักรินทร์ ศิริวิมลการณ์

Page 1 of 1

โรงพยาบาล บีเอ็นเอช [illegible] เขตบางรัก กรุงเทพฯ 10500 โทร. 0 2686 2700 แฟกซ์ [illegible]
BNH HOSPITAL [illegible] Convent Rd. Silom, Bangrak, Bangkok 10500 Tel. 0-2686 2700 Fax. 0-2632 0577-8
www.BNHhospital.com

BNH HOSPITALINR 3 141221

TSOUJü11.jhq= 02/12/2014 13:55:

MR. JEAN BRIJNEL

Prozac (20 MgYCapsule #

Once eriBreakfast

www.BNHhospltaI.c,

BNH HOS

H TsouJfJ1tnaülå

(Bangkok Nursing

MR. JEAN - LUC

Rivotril (2 mg)l

Take 1 Tablet

Once Daily Before Bet

(It May Cause Drowsi

EXHIBIT Q

Q&DdQ.ElQtEEscortAgency

French modeling agency owner Jean-Luc Brunel€ qgonoyöMiami Bench. Escort Stings . a time to meet and find themselves ensnared

orldn-> escort

Girl Escort In Florida

The most popular grown-up girléscort floridd sites reported by modoång owno Jean-Luc Brunet, whoco,ownsthe MC2 agency in sunrise-abc-sc6-aps,yi .orp/?iqlf

Nortb-MÅamLP-eachYiåi!jng

Singer requires police escort. Moetradiostatipn# drop Iglesiae from French modelitp

Jean-Luc Brunei, who co-owns the MC2 agency in Miami

$htté•

rsv l

Davis Escortes •

More often than not, these escorts»åreiegitimatå+tofessionalt, ner Joan. Lu

escorts-in-washburn-yi.org/daws-

E$cortGirls In Florida

i French modeling agency owner Jean-Luc Brune . o co-owns the MC2 agency in Miami Beach. >rpfés$iöpal London Girls for You I Destin Florida Escort

<http;thnonrovl.•vvalliowtia fuck escort qui*

M mißea h Florida Escorts

owner,JeänYLué Nino Strings Attached ... French modeling agency

• •r.http:;;powyr.nall yi beach florida escort:;'

Message

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EXHIBIT

http://www.politico.com/blogs/under-the-radar/2014/12/court-filing-levels-sex-claims-atalan-dershowitz-200495.html

Woman who sued convicted billionaire over sex abuse levels claims at his friends

By JOSH GERSTEIN I

12/31/14 6:38 PM EST

A woman allegedly kept as a sex slave by politically-connected billionaire investor Jeffrey Epstein, who went to jail for having sex with underaged girls, is accusing several prominent friends of the financier of having taken part in the debauchery, according to a new court filing.

The woman—referred to in court papers as Jane Doe #3—leveled the allegations Tuesday against Harvard Law School professor Alan Dershowitz and Britain's Prince Andrew, as well as British socialite Ghislaine Maxwell and French model scout Jean Luc Brunel.

Dershowitz flatly denied the claims about him Wednesday in an interview with POLITICO.

"It's totally, unequivocally and completely false," the celebrated attorney said.

A spokesman for Prince Andrew denied the allegations Friday, while a lawyer who handled related matters for Maxwell did not respond to an e-mail seeking comment. Representatives of Brunel's modeling firm also did not reply to e-mail messages.

The accusations came in a long-running lawsuit charging federal prosecutors in Florida with violating a victims-rights law by failing to consult with Epstein's victims before signing off on a plea deal. That pact ruled out any federal prosecution of the investor, who agreed to plead guilty to two state prostitution-related felony charges. Lawyers for the victims have described the arrangement as a sweetheart deal the well-connected Epstein and his high-powered legal team achieved by putting pressure on prosecutors.

Epstein served 13 months of an 18-month sentence on the two state charges before being released in 2009. He's now a registered sex offender.

The new court filing, submitted by Florida lawyer Brad Edwards and former federal judge Paul Cassell in a federal court in West Palm Beach, Fla., asked that Jane Doe #3 and another woman be allowed to join the pending case over the victims' rights claim.

"Epstein... trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders. Epstein required Jane Doe #3 to describe the events that she had with these men so that he could potentially blackmail them," the court filing said.

EXHIBIT R

"One such powerful individual that Epstein forced then-minor Jane Doe #3 to have sexual relations with was former Harvard Law Professor Alan Dershowitz, a close friend of Epstein's and well-known criminal defense attorney. Epstein required Jane Doe #3 to have sexual relations with Dershowitz on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands," the legal pleading added.

Dershowitz called the allegations "totally made up and totally fabricated from beginning to end." He said he was not in the places described in the filing at the relevant times, with one exception: he did visit Epstein's private island in the Caribbean on one occasion.

"I was there with my family," the renowned law professor said.

Dershowitz said in a follow-up interview after this post first appeared Wednesday that he's planning to file bar complaints against Edwards and Cassell for inadequately vetting their client's story.

"I'm planning to file disbarment charges against the two lawyers who signed this petition without even checking the manifests of airplanes or travel itineraries, et cetera," he said. "I'm also challenging the young woman and the lawyers to level those charges against me outside of the courtroom, so that I can sue them for defamation.....Finally, I'm challenging the woman to file criminal charges against me because the filing of false criminal charges is a crime."

The motion accuses Prince Andrew of similar actions, asserting that "Jane Doe #3 was forced to have sexual relations with this Prince when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell 's apartment), in New York, and on Epstein's private island in the U.S. Virgin Islands (in an orgy with numerous other under-aged girls)."

Previous press accounts have reported on Prince Andrew's friendship with Epstein, who was known as a philanthropist and supporter of scientific research before the criminal investigations began nearly a decade ago. However, the earlier accounts stopped short of accusing the prince of sexual involvement with girls Epstein procured. In a 2011 Vanity Fair story, Prince Andrew denied any such contact.

While a Buckingham Palace spokesman did not respond to POLITICO's query about the matter on Wednesday, the palace issued a denial to several British news outlets Friday. "This relates to long-standing and ongoing civil proceedings in the United States, to which The Duke of York is not a party. As such we would not comment on the detail. However, for the avoidance of doubt, any suggestion of impropriety with underage minors is categorically untrue," the statement said.

Prosecutors said in a 2007 draft letter they'd identified 40 young women who could be considered victims of Epstein's illegal acts. Many ofthem filed lawsuits or claims against Epstein and reached out-of-court settlements for amounts that were not disclosed.

EXHIBIT R

While "Jane Doe #3" is unidentified in this week's court filing, her story appears to track with that of a woman who sued Epstein in 2009 and settled with him later that year. She apparently granted an on-the•ecord interview to Britain 's Daily Mail in 201 1 .

Some of the fascination with Epstein on the part of tabloids and glossy magazines stems from his ties to former President Bill Clinton. In 2002, Epstein provided his 727 to Clinton for a trip to Africa to study anti-AIDS programs. Celebrities such as Chris Tucker and Kevin Spacey came along for the ride. The new court filing makes no mention of Clinton, Tucker or Spacey.

The federal investigation obtained manifests for Epstein's private jet travel, but prosecutors never charged anyone besides the investor with involvement in obtaining or using underaged girls for sexual purposes.

The new court filing says this result is in part due to the fact that Epstein's legal team—which included such heavyweights as former independent counsel and solicitor general Ken Starr, trial lawyer Roy Black, and Dershowitz—negotiated a deal that precluded the feds charging anyone as a co-conspirator.

Lawyers for Jane Doe #3 argue in the new motion that Dershowitz put this language in the agreement to protect himself.

However, the law professor told POLITICO he didn't negotiate that deal and it wasn't aimed at protecting him. "I had nothing to do with drafting the non-prosecution agreement," he said.

Dershowitz added that the last draft of the agreement mentioned four people by name who wouldn't be prosecuted and he was not among them. All were regular associates or assistants of Epstein, the lawyer said, adding that the final language removed those names and simply barred federal prosecutors in South Florida from going after any potential co-conspirators.

Epstein and his lawyers fought hard to prevent records about his plea negotiations from being turned over to victims' attorneys. However, U.S. District Court Judge Keith Marra ruled last year that the victims are entitled to examine those records to prepare their case against the government.

Epstein, Black and others appealed that decision to the Atlanta-based I Ith Circuit Court of Appeals, but it ruled in April of this year that no privilege protects plea negotiations in this sort of dispute.

Edwards and Cassell did not respond to requests for comment for this post, including an inquiry about their response to Dershowitz's comments. However, the pair appear to be pressing forward with the victims' rights lawsuit, which seeks to unravel the no-federal-prosecution deal cut for Epstein in 2007.

UPDATE (Wednesday, 7:18 P.M.): This post has been updated with further commentfrom Dershowitz.

EXHIBIT R

------- Original message -------From:
Abi Schwinck
Date:16/01/2015 05:16 (GMT+07:OO)
To: Pink ,Jean Luc Brunel ,Jeff Fuller
Subject: FW: Victoria

From: Erik Bechtol [mailto:erik@pageparkes.com]
Sent: Thursday, January 15, 2015 5:12 PM
To: Abi Schwinck Subject:
Victoria

Hey Abi!

Hope you're well. :) I've just had a conversation with Victoria, and she isn't comfortable remaining with MC2 with all the drama going on right now in the press. She's asked me to contact you on her behalf. Please let me know if you see any issue with this. Thanks so much!

Erik Bechtol

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